

(ee) In the "Occupancy Types" table, Deutsche stated that 87.97% of the mortgage loans in loan group 1 of the CWALT 2006-39CB Securitization were secured by a "Primary Residence," 7.71% by an "Investment Property," and 4.32% by a "Secondary Residence." CWALT 2006-39CB Pros. Sup. S-45.

(ff) In "The Mortgage Pool" section, of the prospectus supplement for the CWALT 2006-39CB Securitization, Deutsche presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 of that securitization into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2006-39CB Pros. Sup. S-58.

(gg) In the "Occupancy Types" table, Deutsche stated that 69.24% of the mortgage loans in loan group 2 of the CWALT 2006-39CB Securitization were secured by a "Primary Residence," 25.61% by an "Investment Property," and 5.15% by a "Secondary Residence." CWALT 2006-39CB Pros. Sup. S-58.

Item 96. Details of properties that were stated to be owner-occupied, but were not:
CWALT 2006-6CB

- (a) Number of loans on which the owner of the property instructed tax authorities to send property tax bills to him or her at a different address: 763
- (b) Number of loans on which the owner of the property could have, but did not, designate the property as his or her homestead: 1,064
- (c) Number of loans on which the owner of the property owned three or more properties: 89
- (d) Number of loans that went straight from current to foreclosure or ownership by lender: 1
- (e) Eliminating duplicates, number of loans about which one or more of statements (a) through (d) is true: 1,672

CWALT 2006-19CB

- 1 (a) Number of loans on which the owner of the property instructed tax
 2 authorities to send property tax bills to him or her at a different address: 569
 3 (b) Number of loans on which the owner of the property could have, but did not,
 4 designate the property as his or her homestead: 825
 5 (c) Number of loans on which the owner of the property owned three or more
 6 properties: 72
 7 (d) Eliminating duplicates, number of loans about which one or more of
 8 statements (a) through (c) is true: 1,281

9 *CWALT 2006-25CB*

- 10 (a) Number of loans on which the owner of the property instructed tax
 11 authorities to send property tax bills to him or her at a different address: 179
 12 (b) Number of loans on which the owner of the property could have, but did not,
 13 designate the property as his or her homestead: 268
 14 (c) Number of loans on which the owner of the property owned three or more
 15 properties: 18
 16 (d) Number of loans that went straight from current to foreclosure or ownership
 17 by lender: 1
 18 (e) Eliminating duplicates, number of loans about which one or more of
 19 statements (a) through (d) is true: 409

20 *CWALT 2006-31CB*

- 21 (a) Number of loans on which the owner of the property instructed tax
 22 authorities to send property tax bills to him or her at a different address: 322
 23 (b) Number of loans on which the owner of the property could have, but did not,
 24 designate the property as his or her homestead: 434
 25 (c) Number of loans on which the owner of the property owned three or more
 26 properties: 42
 27 (d) Eliminating duplicates, number of loans about which one or more of
 28 statements (a) through (c) is true: 695

Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

In each of the prospectus supplements for the Underlying Securitizations, Deutsche made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. CWALT 2006-6CB Pros. Sup. S-58 to S-64, CWALT 2006-19CB Pros. Sup. S-45 to S-50, CWALT 2006-25CB Pros. Sup. S-38 to S-43, CWALT 2006-31CB Pros. Sup. S-45 to S-50, and CWALT 2006-39CB Pros. Sup. S-64 to S-70. In particular, Deutsche stated that:

"Exceptions to Countrywide Home Loans' underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower." CWALT 2006-6CB Pros. Sup. S-59, CWALT 2006-19CB Pros. Sup. S-46, CWALT 2006-25CB Pros. Sup. S-39, CWALT 2006-31CB Pros. Sup. S-46, and CWALT 2006-39CB Pros. Sup. S-65.

"Countrywide Home Loans' underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment ability and the value and adequacy of the mortgaged property as collateral." CWALT 2006-6CB Pros. Sup. S-59, CWALT 2006-19CB Pros. Sup. S-45, CWALT 2006-25CB Pros. Sup. S-39, CWALT 2006-31CB Pros. Sup. S-46, and CWALT 2006-39CB Pros. Sup. S-65.

Item 106. Early payment defaults:

CWALT 2006-19CB

- (a) Number of the mortgage loans that suffered EPDs: 24
- (b) Percent of the mortgage loans that suffered EPDs: 0.3%
- (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that experienced EPDs: 0.44%

CWALT 2006-31CB

- (a) Number of the mortgage loans that suffered EPDs: 17
- (b) Percent of the mortgage loans that suffered EPDs: 0.4%

- 1 (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans
 2 made at the same time as the loans in the collateral pool that experienced
 3 EPDs: 0.44%

4 **Item 108. 30+ days delinquencies in this securitization:**

5 *CWALT 2006-6CB*

- 6 (a) Number of the mortgage loans that were 30+ days delinquent on March 31,
 7 2010: 2,035
 8 (b) Percent of the mortgage loans that were 30+ days delinquent on March 31,
 9 2010: 19.9%
 10 (c) Percent of all mortgage loans in the United States that were 30+ days
 11 delinquent on March 31, 2010: 14.7%

12 *CWALT 2006-19CB*

- 13 (a) Number of the mortgage loans that were 30+ days delinquent on March 31,
 14 2010: 1,345
 15 (b) Percent of the mortgage loans that were 30+ days delinquent on March 31,
 16 2010: 18.6%
 17 (c) Percent of all mortgage loans in the United States that were 30+ days
 18 delinquent on March 31, 2010: 14.7%

19 *CWALT 2006-25CB*

- 20 (a) Number of the mortgage loans that were 30+ days delinquent on March 31,
 21 2010: 409
 22 (b) Percent of the mortgage loans that were 30+ days delinquent on March 31,
 23 2010: 17.1%
 24 (c) Percent of all mortgage loans in the United States that were 30+ days
 25 delinquent on March 31, 2010: 14.7%

26 *CWALT 2006-31CB*

- 27 (a) Number of the mortgage loans that were 30+ days delinquent on March 31,
 28 2010: 903

(b) Percent of the mortgage loans that were 30+ days delinquent on March 31, 2010: 21.2%

(c) Percent of all mortgage loans in the United States that were 30+ days delinquent on March 31, 2010: 14.7%

Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:

On pages ii, 6 to 7, and 57 to 58 of the private placement memorandum, Deutsche and Deutsche Alt-A made statements about the ratings assigned to the certificate issued in this securitization. Deutsche and Deutsche Alt-A stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by Standard & Poor's Rating Services. These were the highest ratings available from these two rating agencies.

Deutsche and Deutsche Alt-A also stated: "It is a condition to the issuance of the [Bank's certificate] that [it] be assigned ratings not lower than 'Aaa' by Moody's Investors Service, Inc. ('Moody's'), [and] 'AAA' by Standard & Poor's Rating Services . . ." DBALT 2007-RS1 Priv. Place. Mem. 6 to 7.

Item 120. Summary of loans about which the Defendants made untrue or misleading statements:

CWALT 2006-6CB

(a) Number of loans whose LTVs were materially understated: 2,992

(b) Number of loans in which the owner's equity was reduced by 5% or more by undisclosed additional liens: 525

(c) Number of loans in which the properties were stated to be owner-occupied but were not: 1,672

(d) Eliminating duplicates, number of loans about which the Defendants made untrue or misleading statements: 4,295

(e) Eliminating duplicates, percent of loans about which the Defendants made untrue or misleading statements: 50.2%

1 *CWALT 2006-19CB*

- 2 (a) Number of loans whose LTVs were materially understated: 2,333
- 3 (b) Number of loans in which the owner's equity was reduced by 5% or more by
- 4 undisclosed additional liens: 365
- 5 (c) Number of loans that suffered EPDs: 24
- 6 (d) Number of loans in which the properties were stated to be owner-occupied
- 7 but were not: 1,281
- 8 (e) Eliminating duplicates, number of loans about which the Defendants made
- 9 untrue or misleading statements: 3,356
- 10 (f) Eliminating duplicates, percent of loans about which the Defendants made
- 11 untrue or misleading statements: 57.0%
- 12

13 *CWALT 2006-25CB*

- 14 (a) Number of loans whose LTVs were materially understated: 807
- 15 (b) Number of loans in which the owner's equity was reduced by 5% or more by
- 16 undisclosed additional liens: 85
- 17 (c) Number of loans in which the properties were stated to be owner-occupied
- 18 but were not: 409
- 19 (d) Eliminating duplicates, number of loans about which the Defendants made
- 20 untrue or misleading statements: 1,543
- 21 (e) Eliminating duplicates, percent of loans about which the Defendants made
- 22 untrue or misleading statements: 64.4
- 23

24 **Item 120. Summary of loans about which the Defendants made untrue or misleading**

25 **statements:**

- 26 (a) Number of loans whose LTVs were materially understated: 1,328
- 27 (b) Number of loans in which the properties were stated to be owner-occupied
- 28 but were not: 695

- 1 (c) Eliminating duplicates, number of loans about which the Defendants made
- 2 untrue or misleading statements: 1,715
- 3 (d) Eliminating duplicates, percent of loans about which the Defendants made
- 4 untrue or misleading statements: 40.2%
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1 **SCHEDULE 14 TO FIRST AMENDED COMPLAINT**

2 To the extent that this Schedule is incorporated by reference into allegations in the
3 complaint, those allegations are made against Defendants Deutsche and Deutsche Alt-A.

4 **Item 44. Details of trust and certificate(s).**

5 (a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

6 (b) **Description of the trust:** Deutsche Alt-A Securities Re-securitization Trust
7 Certificates, Series 2007-2R was a re-securitization in July 2007. The assets of Deutsche Alt-A
8 Securities Re-securitization Trust Certificates, Series 2007-2R consisted primarily of a mortgage
9 pass-through certificate in tranche 1-A-1 of Countrywide Alternative Loan Trust, Mortgage Pass-
10 Through Certificates, Series 2007-21CB (referred to as the "Underlying Securitization").

11 The Underlying Securitization was a securitization of 2,667 mortgage loans,⁹ in two
12 groups. Countrywide Home Loans, Inc. originated or acquired the mortgage loans in the collateral
13 pool of the Underlying Securitization CWALT 2007-21CB Pros. Sup. S-41.

14 In connection with its offer and sale of this certificate to the Bank, Deutsche and Deutsche
15 alt-A sent numerous documents to the Bank at its office in San Francisco County. These
16 documents included a private placement memorandum for this securitization and a prospectus
17 supplement filed with the SEC for the Underlying Securitization. In the private placement
18 memorandum, Deutsche and Deutsche Alt-A made, and, in the prospectus supplement for the
19 Underlying Securitization, Deutsche made, statements of material fact about the certificate that it
20 offered and sold to the Bank and the certificates that served as collateral for Deutsche Alt-A
21 Securities Re-securitization Trust Certificates, Series 2007-2R.

22 (c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and
23 sold to the Bank a senior certificate in Deutsche Alt-A Securities Re-securitization Trust 2007-
24

25
26 ⁹ CWALT 2007-21CB was a prefunded securitization. On the closing date of the securitization
27 there were 2,667 mortgage loans in the trust. After the closing date of the securitization, the trust
28 purchased an additional 661 mortgage loans.

1 2R, in tranche 1-A-1, for which The Bank paid \$292,250,600 plus accrued interest on July 30,
2 2007.

3 (d) Ratings of the certificate(s) when the Bank purchased them: Standard &
4 Poor's — AAA; Moody's — Aaa.

5 (e) Current ratings of the certificate(s): Standard & Poor's • BBB+, Moody's •
6 Ba2.

7 (f) URL of prospectus supplement for this securitization: A true copy of the
8 prospectus supplement for the Underlying Securitization is available at
9 <http://www.sec.gov/Archives/edgar/data/1269518/000136231007001538/c70854e424b5.htm>.

10 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

11 In the prospectus supplement, Deutsche made the following statements about the LTVs of
12 the mortgage loans in the collateral pool of the Underlying Securitization.

13 As of the initial cut-off date, the weighted average original LTV of the mortgage loans in
14 loan group 1 of the Underlying Securitization was 65.43%. CWALT 2007-21CB Pros. Sup. S-6.

15 As of the initial cut-off date, the weighted average original LTV of the mortgage loans in
16 loan group 2 of the Underlying Securitization was 72.7%. CWALT 2007-21CB Pros. Sup. S-6.

17 "No mortgage loan in any loan group had a Loan-to-Value Ratio at origination or on the
18 closing date of more than 100.00%." CWALT 2007-21CB Pros. Sup. S-35.

19 In Annex A of the prospectus supplement ("The Mortgage Pool"), Deutsche presented
20 tables of statistics about the mortgage loans in the Underlying Securitization. CWALT 2007-
21 21CB Pros. Sup. A-1 to A-18. Each table focused on a certain characteristic of the loans (for
22 example, current mortgage loan principal balance) and divided the loans into categories based on
23 that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000,
24 \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data
25 about the loans in each category. Among these data was the "Weighted Average Original Loan-
26 to-Value Ratio." There were 13 such tables in Annex A for the loans in loan group 1. In each
27 table, the number of categories into which the loans were divided ranged from three to 19. Thus,
28

1 in Annex A, Deutsche made hundreds of statements about the original LTVs of the loans in loan
2 group 1. CWALT 2007-21CB Pros. Sup. A-1 through A-9.

3 "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio of the
4 Initial Mortgage Loans in loan group 1 was approximately 65.43%." CWALT 2007-21CB Pros.
5 Sup. A-4.

6 In Annex A, Deutsche presented similar tables of statistics about the mortgage loans in
7 loan group 2 of the Underlying Securitization. In these tables, Deutsche similarly made hundreds
8 of statements about the original LTVs of the loans in loan group 2. CWALT 2007-21CB Pros.
9 Sup. A-10 through A-18.

10 "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio of the
11 Initial Mortgage Loans in loan group 2 was approximately 72.70%." CWALT 2007-21CB Pros.
12 Sup. A-13.

13 **Item 62. Details of the results of the AVM analysis:**

14	Number of loans	3,328
15	Number of properties on which there was enough information for the model to determine a true market value	1,851
16	Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,206
17	Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$90,029,622
18	Number of loans on which the stated value was 95% or less of the true market value as reported by the model	201
19	Aggregate amount by which the true market values of those properties exceeded their stated values	\$14,693,030
20	Number of loans with LTVs over 100%, as stated by Defendants	0
21	Number of loans with LTVs over 100%, as determined by the model	209
22	Weighted-average LTV, as stated by Defendants (group 1)	65.4%
23	Weighted-average LTV, as determined by the model (group 1)	75.0%

24 **Item 65. Evidence from subsequent sales of refinanced properties:**

25 Of the 3,328 mortgage loans in the collateral pool, 1,476 were taken out to refinance,
26 rather than to purchase, properties. For those 1,476 loans, the value (denominator) in the LTV
27 was an appraised value rather than a sale price. Of those 1,476 properties, 76 were subsequently
28 sold for a total of approximately \$19,204,896. The total value ascribed to those same properties in

1 the LTV data reported in the prospectus supplements and other documents sent to the Bank was
 2 \$27,345,400. Thus, those properties were sold for 70.2% of the value ascribed to them, a
 3 difference of 29.8%. This difference cannot be accounted for by declines in house prices in the
 4 areas in which those properties were located.

5 **Item 82. Untrue or misleading statements about compliance with USPAP:**

6 In the prospectus supplement, Deutsche made statements about the appraisals of the
 7 properties that secured the mortgage loans originated by Countrywide Home Loans, Inc.: "All
 8 appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in
 9 effect." CWALT 2007-21CB Pros. Sup. S-43.

10 **Item 88. Untrue or misleading statements about owner-occupancy of the properties**
 11 **that secured the mortgage loans:**

12 In the prospectus supplement, Deutsche made the following statements about the
 13 occupancy status of the properties that secured the mortgage loans in the collateral pool of the
 14 Underlying Securitization.

15 In Annex A of the prospectus supplement, described in Item 52, Deutsche presented a
 16 table entitled "Occupancy Types." This table divided the mortgage loans in loan group 1 of the
 17 Underlying Securitization into the categories "Primary Residence," "Investment Property," and
 18 "Secondary Residence." The table made untrue and misleading statements about the number of
 19 mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate
 20 principal balance outstanding in each of these categories. CWALT 2007-21CB Pros. Sup. A-7.

21 In the "Occupancy Types" table, Deutsche stated that 84.37% of the mortgage loans in
 22 loan group 1 of the Underlying Securitization were secured by a "Primary Residence," 8.98% by
 23 an "Investment Property," and 6.65% by a "Secondary Residence." CWALT 2007-21CB Pros.
 24 Sup. A-7.

25 In Annex A, Deutsche presented another table entitled "Occupancy Types." This table
 26 divided the mortgage loans in loan group 2 into the categories "Primary Residence," "Investment
 27 Property," and "Secondary Residence." The table made untrue and misleading statements about
 28 the number of mortgage loans, the aggregate principal balance outstanding, and the percent of

1 aggregate principal balance outstanding in each of these categories. CWALT 2007-21CB Pros.
2 Sup. A-17.

3 In the "Occupancy Types" table, Deutsche stated that 92.16% of the mortgage loans in
4 loan group 2 of the Underlying Securitization were secured by a "Primary Residence," 4.32% by
5 an "Investment Property," and 3.52% by a "Secondary Residence." CWALT 2007-21CB Pros.
6 Sup. A-17.

7 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

- 8 (a) Number of loans on which the owner of the property instructed tax
9 authorities to send property tax bills to him or her at a different address: 224
- 10 (b) Number of loans on which the owner of the property could have, but did not,
11 designate the property as his or her homestead: 376
- 12 (c) Number of loans on which the owner of the property owned three or more
13 properties: 32
- 14 (d) Eliminating duplicates, number of loans about which one or more of
15 statements (a) through (c) is true: 569

16 **Item 99. Untrue or misleading statements about the underwriting standards of the**
17 **originators of the mortgage loans:**

18 On pages S-41 through S-47 of the prospectus supplement, Deutsche made statements
19 about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are
20 incorporated herein by reference. In particular, Deutsche stated that:

21 "Exceptions to Countrywide Home Loans' underwriting guidelines may be made if
22 compensating factors are demonstrated by a prospective borrower." CWALT 2007-21CB Pros.
23 Sup. S-42.

24 **Item 108. 30+ days delinquencies in this securitization:**

- 25 (a) Number of the mortgage loans that were 30+ days delinquent on March 31,
26 2010: 438
- 27 (b) Percent of the mortgage loans that were 30+ days delinquent on March 31,
28 2010: 13.2%

- 1 (c) **Percent of all mortgage loans in the United States that were 30+ days**
 2 **delinquent on March 31, 2010: 14.7%**

3 **Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:**

4 On pages ii, 5 to 6, and 36 of the private placement memorandum, Deutsche and Deutsche
 5 Alt-A made statements about the ratings assigned to the certificate issued in this securitization.
 6 Deutsche and Deutsche Alt-A stated that the Bank's certificate was rated Aaa by Moody's
 7 Investors Service, Inc. and AAA by Standard & Poor's Rating Services. These were the highest
 8 ratings available from these two rating agencies.

9 Deutsche and Deutsche Alt-A also stated: "It is a condition to the issuance of the [Bank's
 10 certificate] that [it] will have been rated at least 'AAA' and 'Aaa' by Standard & Poor's and
 11 Moody's, respectively." DBALT 2007-2R Priv. Place. Mem. 5 to 6.

12 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
 13 **statements:**

- 14 (a) **Number of loans whose LTVs were materially understated: 1,206**
 15 (b) **Number of loans in which the properties were stated to be owner-occupied**
 16 **but were not: 569**
 17 (d) **Eliminating duplicates, number of loans about which the Defendants made**
 18 **untrue or misleading statements: 1,461**
 19 (e) **Eliminating duplicates, percent of loans about which the Defendants made**
 20 **untrue or misleading statements: 43.9%**

SCHEDULE 15 TO FIRST AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche and Deutsche Alt-A.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Deutsche Alt-A Securities, Inc. Mortgage Loan Trust, Mortgage Pass-Through Certificates, Series 2005-6 was a securitization in November 2005 of 2,060 mortgage loans, in two groups. GreenPoint Mortgage Funding, Inc. originated or acquired 73.83% of the mortgage loans in loan group I. DBALT 2005-6 Pros. Sup. S-1 and S-33.¹⁰

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche I-A-1, for which the Bank paid \$104,995,625 plus accrued interest on November 30, 2005.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Standard & Poor's – AAA; Moody's – Aaa.

(e) **Current ratings of the certificate(s):** Standard & Poor's – CCC; Moody's Ba1.

(f) **URL of prospectus supplement for this securitization:**

http://www.sec.gov/Archives/edgar/data/1199474/000093041305007998/c40009_424b5.txt.

Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:

In the prospectus supplement, Deutsche and Deutsche Alt-A made the following statements about the LTVs of the mortgage loans in the collateral pool of this securitization.

(hh) The original LTVs of the mortgage loans in loan group I ranged from 18.67% to 100%, with a weighted average of 75.31%. DBALT 2005-6 Pros. Sup. S-5.

(ii) "Approximately 5.75% and 1.42% of the Group I Mortgage Loans . . . had loan-to-value ratios greater than approximately 80% at origination . . ." DBALT 2005-6 Pros. Sup. S-24 and S-26.

¹⁰ The Bank makes no allegations about the mortgage loans in group II.

1 (jj) "None of the Mortgage Loans had a loan-to-value ratio in excess of 100% at
2 origination." DBALT 2005-6 Pros. Sup. S-25.

3 (kk) 94.25% of the mortgage loans in loan group I had an LTV of less than or equal to
4 80%. DBALT 2005-6 Pros. Sup. S-25.

5 (ll) 5.44% of the mortgage loans in loan group I had an LTV of greater than 80%, but
6 less than or equal to 95%. DBALT 2005-6 Pros. Sup. S-25.

7 (mm) 1.42% of the mortgage loans in loan group II had an LTV of greater than 80%, but
8 less than or equal to 95%. DBALT 2005-6 Pros. Sup. S-25.

9 (nn) In the "Description of the Mortgage Pool" section of the prospectus supplement,
10 Deutsche and Deutsche Alt-A presented tables of statistics about the mortgage loans in the
11 collateral pool. DBALT 2005-6 Pros. Sup. S-27 to S-44. Each table focused on a certain
12 characteristic of the loans (for example, principal balance of the mortgage loans at origination)
13 and divided the loans into categories based on that characteristic (for example, mortgage loans
14 with a principal balance at origination of \$1 to \$50,000, \$50,001 to \$100,000, \$100,001 to
15 \$150,000, etc.). One of the tables, entitled "Original Loan-to-Value Ratios of the Group I
16 Mortgage Loans," divided the mortgage loans in loan group I into 11 categories of original LTV
17 (for example, 0.01% to 50%, 50.01% to 55%, 55.01% to 60%, etc.). The table made untrue and
18 misleading statements about the number of mortgage loans, the aggregate principal balance
19 outstanding, and the percent of aggregate principal balance outstanding in each of these
20 categories. DBALT 2005-6 Pros. Sup. S-36.

21 (oo) In the "Description of the Mortgage Pool" section, Deutsche and Deutsche Alt-A
22 presented a table entitled "Effective Original Loan-to-Value Ratios of the Group I Mortgage
23 Loans." This table divided the mortgage loans in loan group I into seven categories of effective
24 original LTV (for example, 0.01% to 50%, 50.01% to 55%, 55.01% to 60%, etc.). The table made
25 untrue and misleading statements about the number of mortgage loans, the aggregate principal
26 balance outstanding, and the percent of aggregate principal balance outstanding in each of these
27 categories. DBALT 2005-6 Pros. Sup. S-37.

28

Item 62. Details of the results of the AVM analysis:

Number of loans in group I	737
Number of properties in group I on which there was enough information for the model to determine a true market value	217
Number of loans in group I on which the stated value was 105% or more of the true market value as reported by the model	119
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$9,716,370
Number of loans in group I on which the stated value was 95% or less of the true market value as reported by the model	36
Aggregate amount by which the true market values of those properties exceed their stated values	\$3,742,910
Number of loans in group I with LTVs over 100%, as stated by Defendants	0
Number of loans in group I with LTVs over 100%, as determined by the model	34
Weighted-average LTV, as stated by Defendants (group I)	75.31%
Weighted-average LTV, as determined by the model (group I)	85.3%

Item 65. Evidence from subsequent sales of refinanced properties:

Of the 737 mortgage loans in group I, 382 were taken out to refinance, rather than to purchase, properties. For those 382 loans, the value (denominator) in the LTV was an appraised value rather than a sale price. Of those 382 properties, 22 were subsequently sold for a total of approximately \$7,294,725. The total value ascribed to those same properties in the LTV data reported in the prospectus supplements and other documents sent to the Bank was \$9,161,000. Thus, those properties were sold for 79.6% of the value ascribed to them, a difference of 20.4%. This difference cannot be accounted for by declines in house prices in the areas in which those properties were located.

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 28
- (b) Total reduction in equity from additional liens: \$1,829,700
- (c) Weighted-average reduction in equity from additional liens: 57.3%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and Deutsche Alt-A made the following statement about the appraisals of the properties that secured the mortgage loans in this securitization: "The

1 Group II Mortgage Loans have been purchased or originated, underwritten and documented in
 2 accordance with the guidelines of Fannie Mae, [and] Freddie Mac” DBALT 2005-6 Pros.
 3 Sup. S-50.

4 **Item 88. Untrue or misleading statements about owner-occupancy of the properties**
 5 **that secured the mortgage loans:**

6 In the prospectus supplement, Deutsche and Deutsche Alt-A made the following
 7 statements about the occupancy status of the properties that secured the mortgage loans in the
 8 collateral pool of this securitization.

9 (a) In the “Description of the Mortgage Pool” section of the prospectus supplement,
 10 described in Item 52, Deutsche and Deutsche Alt-A presented a table entitled “Occupancy Status
 11 of the Group I Mortgage Loans.” This table divided the mortgage loans in loan group I into the
 12 categories “Primary,” “Investment,” and “Second Home.” The table made untrue and misleading
 13 statements about the number of mortgage loans, the aggregate principal balance outstanding, and
 14 the percent of aggregate principal balance outstanding in each of these categories. DBALT 2005-
 15 6 Pros. Sup. S-38.

16 (b) In the “Occupancy Status of the Group I Mortgage Loans” table, Deutsche and
 17 Deutsche Alt-A stated that 81.1% of the mortgage loans in loan group I were secured by a
 18 “Primary” residence, 15.98% by an “Investment” property, and 2.92% by a “Second Home.”
 19 DBALT 2005-6 Pros. Sup. S-38.

20 **Item 96. Details of properties in group I that were stated to be owner-occupied, but**
 21 **were not:**

22 (a) Number of loans on which the owner of the property instructed tax
 23 authorities to send property tax bills to him or her at a different address: 22

24 (b) Number of loans on which the owner of the property could have, but did not,
 25 designate the property as his or her homestead: 41

26 (c) Number of loans on which the owner of the property owned three or more
 27 properties: 2

28

- 1 (d) Eliminating duplicates, number of loans about which one or more of
2 statements (a) through (c) is true: 61

3 **Item 99. Untrue or misleading statements about the underwriting standards of the**
4 **originators of the mortgage loans:**

5 On pages S-47 through S-48 of the prospectus supplement, Deutsche and Deutsche Alt-A
6 made statements about the underwriting guidelines of GreenPoint Mortgage Funding, Inc. All of
7 those statements are incorporated herein by reference. In particular, Deutsche and Deutsche Alt-A
8 stated that:

9 (a) "Exceptions to GreenPoint's underwriting guidelines are permitted where
10 compensating factors are present." DBALT 2005-6 Pros. Sup. S-48.

11 (b) "Generally, GreenPoint's underwriting guidelines are applied to evaluate the
12 prospective mortgagor's credit standing and repayment ability and the value and adequacy of the
13 mortgaged property as collateral." DBALT 2005-6 Pros. Sup. S-48.

14 On pages S-49 through S-50 of the prospectus supplement, Deutsche and Deutsche Alt-A
15 made statements about the underwriting guidelines of First National Bank of Nevada, N.A. All of
16 those statements are incorporated herein by reference. In particular, Deutsche and Deutsche Alt-A
17 stated that:

18 (c) "[First National Bank of Nevada]'s underwriting guidelines are primarily intended
19 to evaluate the prospective borrower's credit standing and ability to repay the loan, as well as the
20 value and adequacy of the proposed mortgaged property as collateral." DBALT 2005-6 Pros. Sup.
21 S-49.

22 **Item 106. Early payment defaults in group I:**

23 (a) **Number of the mortgage loans that suffered EPDs: 8**

24 (b) **Percent of the mortgage loans that suffered EPDs: 0.4%**

25 (c) **Percent of all securitized, non-agency prime (including Alt-A) mortgage loans**
26 **made at the same time as the loans in the collateral pool that experienced**
27 **EPDs: 0.18%**

1 **Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:**

2 On page iii of the prospectus supplement, Deutsche and Deutsche Alt-A made statements
3 about the ratings assigned to the certificates issued in this securitization. Deutsche and Deutsche
4 Alt-A stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and
5 AAA by Standard & Poor's Rating Services. These were the highest ratings available from these
6 two rating agencies.

7 Deutsche and Deutsche Alt-A also stated: "It is a condition to the issuance of the Offered
8 Certificates that they receive the ratings from Moody's Investors Service, Inc. . . . and Standard &
9 Poor's . . . indicated under "Certificate Ratings" in this prospectus supplement." DBALT 2005-6
10 Pros. Sup. S-54.

11 **Item 120. Summary of loans in group I about which the Defendants made untrue or**
12 **misleading statements:**

- 13 (a) **Number of loans whose LTVs were materially understated: 119**
14 (b) **Number of loans in which the owner's equity was reduced by 5% or more by**
15 **undisclosed additional liens: 28**
16 (c) **Number of loans that suffered EPDs: 8**
17 (d) **Number of loans in which the properties were stated to be owner-occupied**
18 **but were not: 61**
19 (e) **Eliminating duplicates, number of loans about which the Defendants made**
20 **untrue or misleading statements: 183**
21 (f) **Eliminating duplicates, percent of loans about which the Defendants made**
22 **untrue or misleading statements: 8.9%**

1 **SCHEDULE 16 TO FIRST AMENDED COMPLAINT**

2 To the extent that this Schedule is incorporated by reference into allegations in the
3 complaint, those allegations are made against Defendants Deutsche and Deutsche Alt-A.

4 **Item 44. Details of trust and certificate(s).**

5 (a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

6 (b) **Description of the trust:** Deutsche Alt-A Securities, Inc. Mortgage Loan Trust,
7 Mortgage Pass-Through Certificates, Series 2005-5 was a securitization in October 2005 of 2,758
8 mortgage loans, in two groups. The mortgage loans in the collateral pool of this securitization
9 were originated or acquired by National City Mortgage Co., GreenPoint Mortgage Funding, Inc.,
10 MortgageIT, Inc., First National Bank of Nevada, N.A., Impac Funding Corporation, Sierra
11 Pacific Mortgage, Inc., Pinnacle Financial Corporation, and various undisclosed originators.
12 National City Mortgage Co. originated or acquired 26.88% of all of the loans in the collateral
13 pool, GreenPoint Mortgage Funding, Inc. originated or acquired 21%, MortgageIT, Inc.
14 originated or acquired 19.26%, and First National Bank of Nevada, N.A. originated or acquired
15 11.11%. DBALT 2005-5 Pros. Sup. S-1 and S-29. National City Mortgage Co. originated or
16 acquired 48.33% of the loans in loan group I, GreenPoint Mortgage Funding, Inc. originated or
17 acquired 33.01%, and MortgageIT, Inc. originated or acquired 13.38%. DBALT 2005-5 Pros.
18 Sup. S-1 and S-35. MortgageIT, Inc. originated or acquired 26.63% of the loans in loan group II,
19 First National Bank of Nevada, N.A. originated or acquired 22.48%, and Impac Funding
20 Corporation originated or acquired 15.88%. DBALT 2005-5 Pros. Sup. S-1 and S-41.

21 (c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and
22 sold to the Bank a senior certificate in this securitization, in tranche I-A-1, for which the Bank
23 paid \$131,989,275 plus accrued interest on October 31, 2005.

24 (d) **Ratings of the certificate(s) when the Bank purchased them:** Standard &
25 Poor's – AAA; Moody's – Aaa.

26 (e) **Current ratings of the certificate(s):** Standard & Poor's – AAA; Moody's A1.
27
28

(f) URL of prospectus supplement for this securitization:

http://www.sec.gov/Archives/edgar/data/1199474/000093041305007380/c39673_424b5.txt.

Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:

In the prospectus supplement, Deutsche and Deutsche Alt-A made the following statements about the LTVs of the mortgage loans in the collateral pool of this securitization.

(a) The original LTVs of all of the mortgage loans in the collateral pool ranged from 14.41% to 100%, with a weighted average of 76.1%. DBALT 2005-5 Pros. Sup. S-4.

(b) The original LTVs of the mortgage loans in loan group I ranged from 14.41% to 100%, with a weighted average of 77.86%. DBALT 2005-5 Pros. Sup. S-5.

(c) The original LTVs of the mortgage loans in loan group II ranged from 15.9% to 100%, with a weighted average of 73.9%. DBALT 2005-5 Pros. Sup. S-6.

(d) "Approximately 17.86% and 6.36% of the Group I Mortgage Loans and Group II Mortgage Loans, respectively, had loan-to-value ratios greater than approximately 80% at origination" DBALT 2005-5 Pros. Sup. S-26 and S-27.

(e) "None of the Mortgage Loans had a loan-to-value ratio in excess of 100% at origination." DBALT 2005-5 Pros. Sup. S-27.

(f) 82.14% of the mortgage loans in loan group I had an LTV of less than or equal to 80%. DBALT 2005-5 Pros. Sup. S-27.

(g) 6.04% of the mortgage loans in loan group I had an LTV of greater than 80%, but less than or equal to 95%. DBALT 2005-5 Pros. Sup. S-27.

(h) 11.82% of the mortgage loans in loan group I had an LTV of greater than 95%. DBALT 2005-5 Pros. Sup. S-27.

(i) 93.64% of the mortgage loans in loan group II had an LTV of less than or equal to 80%. DBALT 2005-5 Pros. Sup. S-27.

(j) 5.77% of the mortgage loans in loan group II had an LTV of greater than 80%, but less than or equal to 95%. DBALT 2005-5 Pros. Sup. S-27.

(k) 0.59% of the mortgage loans in loan group II had an LTV of greater than 95%. DBALT 2005-5 Pros. Sup. S-27.

1 (l) In the "Description of the Mortgage Pool" section of the prospectus supplement,
 2 Deutsche and Deutsche Alt-A presented tables of statistics about the mortgage loans in the
 3 collateral pool. DBALT 2005-5 Pros. Sup. S-29 to S-46. Each table focused on a certain
 4 characteristic of the loans (for example, principal balance of the mortgage loans at origination)
 5 and divided the mortgage loans into categories based on that characteristic (for example,
 6 mortgage loans with a principal balance at origination of \$1 to \$50,000, \$50,001 to \$100,000,
 7 \$100,001 to \$150,000, etc.). Each table then presented various data about the mortgage loans in
 8 each category. One of the tables, entitled "Original Loan-to-Value Ratios of the Mortgage
 9 Loans," divided all of the mortgage loans in the collateral pool into 11 categories of original LTV
 10 (for example, 0.01% to 50%, 50.01% to 55%, 55.01% to 60%, etc.). The table made untrue and
 11 misleading statements about the number of mortgage loans, the aggregate principal balance
 12 outstanding, and the percent of aggregate principal balance outstanding in each of these
 13 categories. DBALT 2005-5 Pros. Sup. S-32.

14 (m) In the "Description of the Mortgage Pool" section, Deutsche and Deutsche Alt-A
 15 presented a table entitled "Original Loan-to-Value Ratios of the Group I Mortgage Loans." This
 16 table divided the mortgage loans in loan group I into 11 categories of original LTV (for example,
 17 0.01% to 50%, 50.01% to 55%, 55.01% to 60%, etc.). The table made untrue and misleading
 18 statements about the number of mortgage loans, the aggregate principal balance outstanding, and
 19 the percent of aggregate principal balance outstanding in each of these categories. DBALT 2005-
 20 5 Pros. Sup. S-38.

21 (n) In the "Description of the Mortgage Pool" section, Deutsche and Deutsche Alt-A
 22 presented a table entitled "Original Loan-to-Value Ratios of the Group II Mortgage Loans." This
 23 table divided the mortgage loans in loan group II into 10 categories of original LTV (for example,
 24 0.01% to 50%, 50.01% to 55%, 55.01% to 60%, etc.). The table made untrue and misleading
 25 statements about the number of mortgage loans, the aggregate principal balance outstanding, and
 26 the percent of aggregate principal balance outstanding in each of these categories. DBALT 2005-
 27 5 Pros. Sup. S-44.

28

Item 62. Details of the results of the AVM analysis:

Number of loans	2,758
Number of properties on which there was enough information for the model to determine a true market value	1,152
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	499
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$33,466,771
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	312
Aggregate amount by which the true market values of those properties exceed their stated values	\$20,716,717
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	131
Weighted-average LTV, as stated by Defendants	76.1%
Weighted-average LTV, as determined by the model	82.1%

Item 65. Evidence from subsequent sales of refinanced properties:

Of the 2,758 mortgage loans in the collateral pool, 873 were taken out to refinance, rather than to purchase, properties. For those 873 loans, the value (denominator) in the LTV was an appraised value rather than a sale price. Of those 873 properties, 110 were subsequently sold for a total of approximately \$37,012,360. The total value ascribed to those same properties in the LTV data reported in the prospectus supplements and other documents sent to the Bank was \$44,743,000. Thus, those properties were sold for 82.7% of the value ascribed to them, a difference of 17.3%. This difference cannot be accounted for by declines in house prices in the areas in which those properties were located.

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 847
- (b) Total reduction in equity from additional liens: \$49,933,477
- (c) Weighted-average reduction in equity from additional liens: 79.9%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and Deutsche Alt-A made the following statement about the appraisals of the properties in this securitization: "Each appraisal must meet the requirements of Fannie Mae and Freddie Mac." DBALT 2005-5 Pros. Sup. S-51.

1 In the prospectus supplement, Deutsche and Deutsche Alt-A made the following statement
 2 about the appraisals of the properties that were originated or acquired by National City Mortgage
 3 Co.: "All appraisals are required to confirm to the Uniform Standards of Professional Appraisal
 4 Practice adopted by the Appraisal Standard Board of the Appraisal Foundation." DBALT 2005-5
 5 Pros. Sup. S-51.

6 In the prospectus supplement, Deutsche and Deutsche Alt-A made the following statement
 7 about the appraisals of the properties that were originated or acquired by MortgageIT, Inc.:
 8 "Every MortgageIT mortgage loan is secured by a property that has been appraised by a licensed
 9 appraiser in accordance with the Uniform Standards of Professional Appraisal Practice of the
 10 Appraisal Foundation." DBALT 2005-5 Pros. Sup. S-53.

11 **Item 88. Untrue or misleading statements about owner-occupancy of the properties**
 12 **that secured the mortgage loans:**

13 In the prospectus supplement, Deutsche and Deutsche Alt-A made the following
 14 statements about the occupancy status of the properties that secured the mortgage loans in the
 15 collateral pool of this securitization.

16 (a) In the "Description of the Mortgage Pool" section of the prospectus supplement,
 17 described in Item 52, Deutsche and Deutsche Alt-A presented a table entitled "Occupancy Status
 18 of the Mortgage Loans." This table divided all of the mortgage loans in the collateral pool into the
 19 categories "Primary," "Investment," and "Second Home." The table made untrue and misleading
 20 statements about the number of mortgage loans, the aggregate principal balance outstanding, and
 21 the percent of aggregate principal balance outstanding in each of these categories. DBALT 2005-
 22 5 Pros. Sup. S-34.

23 (b) In the "Occupancy Status of the Mortgage Loans" table, Deutsche and Deutsche
 24 Alt-A stated that 81.99% of all of the mortgage loans were secured by a "Primary" residence,
 25 15.6% by an "Investment" property, and 2.41% by a "Second Home." DBALT 2005-5 Pros. Sup.
 26 S-34.

27 (c) In the "Description of the Mortgage Pool" section, Deutsche and Deutsche Alt-A
 28 presented a table entitled "Occupancy Status of the Group I Mortgage Loans." This table divided

1 the mortgage loans in loan group I into the categories "Primary," "Investment," and "Second
 2 Home." The table made untrue and misleading statements about the number of mortgage loans,
 3 the aggregate principal balance outstanding, and the percent of aggregate principal balance
 4 outstanding in each of these categories. DBALT 2005-5 Pros. Sup. S-40.

5 (d) In the "Occupancy Status of the Group I Mortgage Loans" table, Deutsche and
 6 Deutsche Alt-A stated that 82.64% of the loans in loan group I were secured by a "Primary"
 7 residence, 16.65% by an "Investment" property, and 0.7% by a "Second Home." DBALT 2005-5
 8 Pros. Sup. S-40.

9 (e) In the "Description of the Mortgage Pool" section, Deutsche and Deutsche Alt-A
 10 presented a table entitled "Occupancy Status of the Group II Mortgage Loans." This table divided
 11 the mortgage loans in loan group II into the categories "Primary," "Investment," and "Second
 12 Home." The table made untrue and misleading statements about the number of mortgage loans,
 13 the aggregate principal balance outstanding, and the percent of aggregate principal balance
 14 outstanding in each of these categories. DBALT 2005-5 Pros. Sup. S-46.

15 (f) In the "Occupancy Status of the Group II Mortgage Loans" table, Deutsche and
 16 Deutsche Alt-A stated that 81.18% of the loans in loan group II were secured by a "Primary"
 17 residence, 14.28% by an "Investment" property, and 4.54% by a "Second Home." DBALT 2005-
 18 5 Pros. Sup. S-46.

19 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

- 20 (a) **Number of loans on which the owner of the property instructed tax**
 21 **authorities to send property tax bills to him or her at a different address: 155**
- 22 (b) **Number of loans on which the owner of the property could have, but did not,**
 23 **designate the property as his or her homestead: 233**
- 24 (c) **Number of loans on which the owner of the property owned three or more**
 25 **properties: 16**
- 26 (d) **Number of loans that went straight from current to foreclosure or ownership**
 27 **by lender: 1**

- 1 (e) Eliminating duplicates, number of loans about which one or more of
2 statements (a) through (d) is true: 353

3 **Item 99. Untrue or misleading statements about the underwriting standards of the**
4 **originators of the mortgage loans:**

5 On pages S-49 through S-51, Deutsche and Deutsche Alt-A made statements about the
6 underwriting guidelines of National City Mortgage Co. All of those statements are incorporated
7 herein by reference. In particular, Deutsche and Deutsche Alt-A stated that:

8 (a) "Exceptions to the underwriting standards are permitted where compensating
9 factors are present." DBALT 2005 Pros. Sup. S-50.

10 (b) "The National City underwriting standards are applied to evaluate the prospective
11 mortgagor's credit standing and repayment ability and the value and adequacy of the mortgaged
12 property as collateral." DBALT 2005-5 Pros. Sup. S-50.

13 On pages S-51 through S-52 of the prospectus supplement, Deutsche and Deutsche Alt-A
14 made statements about the underwriting guidelines of GreenPoint Mortgage Funding, Inc. All of
15 those statements are incorporated herein by reference. In particular, Deutsche and Deutsche Alt-A
16 stated that:

17 (c) "Exceptions to GreenPoint's underwriting guidelines are permitted where
18 compensating factors are present." DBALT 2005-5 Pros. Sup. S-52.

19 (d) "Generally, GreenPoint's underwriting guidelines are applied to evaluate the
20 prospective mortgagor's credit standing and repayment ability and the value and adequacy of the
21 mortgaged property as collateral." DBALT 2005-5 Pros. Sup. S-52.

22 On pages S-52 through S-55 of the prospectus supplement, Deutsche and Deutsche Alt-A
23 made statements about the underwriting guidelines of MortgageIT, Inc. All of those statements
24 are incorporated herein by reference. In particular, Deutsche and Deutsche Alt-A stated that:

25 (e) "[E]xceptions to these underwriting guidelines are considered, so long as the
26 borrower has other reasonable compensating factors, on a case-by-case basis." DBALT 2005-5
27 Pros. Sup. S-55.

1 (f) "When evaluating the ratio of all monthly debt payments to the borrower's
 2 monthly income (debt-to-income ratio), the underwriter should be aware of the degree and
 3 frequency of credit usage and its impact on the borrower's ability to repay the loan." DBALT
 4 2005-2 Pros. Sup. S-55.

5 On pages S-55 through S-57 of the prospectus supplement, Deutsche and Deutsche Alt-A
 6 made statements about the underwriting guidelines of First National Bank of Nevada. All of those
 7 statements are incorporated herein by reference. In particular, Deutsche and Deutsche Alt-A
 8 stated that:

9 (g) "A mortgage loan may be considered to comply with a set of underwriting
 10 standards, even if one or more specific criteria included in such underwriting standards were not
 11 satisfied, if other factors compensated for the criteria that were not satisfied or the mortgage loan
 12 is considered to be in substantial compliance with the underwriting standards." DBALT 2005-5
 13 Pros. Sup. S-56.

14 (h) "[First National Bank of Nevada]'s underwriting guidelines are primarily intended
 15 to evaluate the prospective borrower's credit standing and ability to repay the loan, as well as the
 16 value and adequacy of the proposed mortgaged property as collateral." DBALT 2005-2 Pros. Sup.
 17 S-55.

18 **Item 106. Early payment defaults:**

- 19 (a) **Number of the mortgage loans that suffered EPDs: 18**
- 20 (b) **Percent of the mortgage loans that suffered EPDs: 0.7%**
- 21 (c) **Percent of all securitized, non-agency prime (including Alt-A) mortgage loans**
 22 **made at the same time as the loans in the collateral pool that experienced**
 23 **EPDs: 0.18%**

24 **Item 107. 90+ days delinquencies:**

- 25 (a) **Number of the mortgage loans that suffered 90+ days delinquencies: 434**
- 26 (b) **Percent of the mortgage loans that suffered 90+ days delinquencies: 15.7%**

27
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- 1 (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans
 2 made at the same time as the loans in the collateral pool that suffered 90+
 3 days delinquencies: 16.5%

4 **Item 108. 30+ days delinquencies in this securitization:**

- 5 (a) Number of the mortgage loans that were 30+ days delinquent on March 31,
 6 2010: 429
 7 (b) Percent of the mortgage loans that were 30+ days delinquent on March 31,
 8 2010: 15.6%
 9 (c) Percent of all mortgage loans in the United States that were 30+ days
 10 delinquent on March 31, 2010: 14.7%

11 **Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:**

12 On page iii of the prospectus supplement, Deutsche and Deutsche Alt-A made statements
 13 about the ratings assigned to the certificates issued in this securitization. Deutsche and Deutsche
 14 Alt-A stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and
 15 AAA by Standard & Poor's Rating Services. These were the highest ratings available from these
 16 two rating agencies.

17 Deutsche and Deutsche Alt-A also stated: "It is a condition to the issuance of the Offered
 18 Certificates that they receive the ratings from Moody's Investors Service, Inc. . . . and Standard &
 19 Poor's . . . indicated under "Certificate Ratings" in this prospectus supplement." DBALT 2005-5
 20 Pros. Sup. S-58.

21 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
 22 **statements:**

- 23 (a) Number of loans whose LTVs were materially understated: 499
 24 (b) Number of loans in which the owner's equity was reduced by 5% or more by
 25 undisclosed additional liens: 847
 26 (c) Number of loans that suffered EPDs: 18
 27 (d) Number of loans in which the properties were stated to be owner-occupied
 28 but were not: 353

- 1 (e) Eliminating duplicates, number of loans about which the Defendants made
- 2 untrue or misleading statements: 1,315
- 3 (f) Eliminating duplicates, percent of loans about which the Defendants made
- 4 untrue or misleading statements: 47.7%
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1 **SCHEDULE 17 TO FIRST AMENDED COMPLAINT**

2 To the extent that this Schedule is incorporated by reference into allegations in the
3 complaint, those allegations are made against Defendants Deutsche and CWALT.

4 **Item 44. Details of trust and certificate(s).**

5 (a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

6 (b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through
7 Certificates, Series 2004-30CB was a securitization in December 2004 of 5,653 mortgage loans,¹¹
8 in three groups. The mortgage loans in the collateral pool of this securitization were originated or
9 acquired by Countrywide Home Loans, Inc. CWALT 2004-30CB Pros. Sup. S-4, S-16 and S-43.

10 (c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and
11 sold to the Bank a senior certificate in this securitization, in tranche 1-A-12, for which the Bank
12 paid \$105,189,180 plus accrued interest on December 30, 2004.

13 (d) **Ratings of the certificate(s) when the Bank purchased them:** Standard &
14 Poor's – AAA; Moody's – Aaa.

15 (e) **Current ratings of the certificate(s):** Standard & Poor's – AAA; Moody's –
16 Baa1.

17 (f) **URL of prospectus supplement for this securitization:**
18 <http://www.sec.gov/Archives/edgar/data/1269518/000095012904010229/v03946b5e424b5.txt>

19 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

20 In the prospectus supplement, Deutsche and CWALT made the following statements
21 about the LTVs of the mortgage loans in the collateral pool of this securitization.

22 (a) “No Initial Mortgage Loan had a Loan-to-Value Ratio at origination of more than
23 100.00%.” CWALT 2004-30CB Pros. Sup. S-17.

24 (b) In the section of the prospectus supplement entitled “The Mortgage Pool,”
25 Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral
26

27 ¹¹ CWALT 2004-30CB was a prefunded securitization. On the closing date of the securitization
28 there were 5,653 mortgage loans in the trust. After the closing date of the securitization, the trust
purchased an additional 276 mortgage loans.

1 pool. CWALT 2004-30CB Pros. Sup. S-19 to S-39. Each table focused on a certain characteristic
 2 of the loans (for example, current principal balance) and divided the loans into categories based
 3 on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000,
 4 \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data
 5 about the loans in each category. Among these data was the "Weighted Average Original Loan-
 6 to-Value Ratio." There were 10 such tables in "The Mortgage Pool" section for the loans in loan
 7 group 1. In each table, the number of categories into which the loans were divided ranged from
 8 three to 61. Thus, in "The Mortgage Pool" section of the prospectus supplement, Deutsche and
 9 CWALT made hundreds of statements about the original LTVs of the loans in loan group 1.
 10 CWALT 2004-30CB Pros. Sup. S-19 to S-26.

11 (c) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
 12 of the Initial Mortgage Loans in loan group 1 was approximately 74.40%." CWALT 2004-30CB
 13 Pros. Sup. S-23.

14 (d) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
 15 of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT
 16 similarly made hundreds of statements about the original LTVs of the loans in loan group 2.
 17 CWALT 2004-30CB Pros. Sup. S-27 to S-33.

18 (e) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
 19 of the Initial Mortgage Loans in loan group 2 was approximately 73.82%." CWALT 2004-30CB
 20 Pros. Sup. S-30.

21 (f) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
 22 of statistics about the mortgage loans in loan group 3. In these tables, Deutsche and CWALT
 23 similarly made hundreds of statements about the original LTVs of the loans in loan group 3.
 24 CWALT 2004-30CB Pros. Sup. S-34 to S-39.

25 (g) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
 26 for the Initial Mortgage Loans in loan group 3 was approximately 66.09%." CWALT 2004-30CB
 27 Pros. Sup. S-36.

Item 62. Details of the results of the AVM analysis:

Number of loans	5,929
Number of properties on which there was enough information for the model to determine a true market value	2,554
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,187
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$51,321,501
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	516
Aggregate amount by which the true market values of those properties exceed their stated values	\$22,337,812
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	158
Weighted-average LTV, as stated by Defendants (group 1)	74.4%
Weighted-average LTV, as determined by the model (group 1)	79.8%

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 365
- (b) Total reduction in equity from additional liens: \$17,511,245
- (c) Weighted-average reduction in equity from additional liens: 71.6%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans originated or acquired by Countrywide: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2004-30CB Pros. Sup. S-45.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

- (a) In "The Mortgage Pool" section of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property,"

1 and "Secondary Residence." The table made untrue and misleading statements about the number
 2 of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate
 3 principal balance outstanding in each of these categories. CWALT 2004-30CB Pros. Sup. S-25.

4 (b) In the "Occupancy Types" table, Deutsche and CWALT stated that 79.28% of the
 5 mortgage loans in loan group 1 were secured by a "Primary Residence," 18.07% by an
 6 "Investment Property," and 2.65% by a "Secondary Residence." CWALT 2004-30CB Pros. Sup.
 7 S-25.

8 (c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table
 9 entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the
 10 categories "Primary Residence," "Investment Property," and "Secondary Residence." The table
 11 made untrue and misleading statements about the number of mortgage loans, the aggregate
 12 principal balance outstanding, and the percent of aggregate principal balance outstanding in each
 13 of these categories. CWALT 2004-30CB Pros. Sup. S-33.

14 (d) In the "Occupancy Types" table, Deutsche and CWALT stated that 89.36% of the
 15 mortgage loans in loan group 2 were secured by a "Primary Residence," 6.9% by an "Investment
 16 Property," and 3.74% by a "Secondary Residence." CWALT 2004-30CB Pros. Sup. S-33.

17 (e) "The Mortgage Pool" section, Deutsche and CWALT presented another table
 18 entitled "Occupancy Types." In this table, Deutsche and CWALT divided the mortgage loans in
 19 loan group 3 into the categories "Primary Residence," "Investment Property," and "Secondary
 20 Residence." The table made untrue and misleading statements about the number of mortgage
 21 loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance
 22 outstanding in each of these categories. CWALT 2004-30CB Pros. Sup. S-39.

23 (f) In the "Occupancy Types" table, Deutsche and CWALT stated that 71.43% of the
 24 mortgage loans in loan group 3 were secured by a "Primary Residence," 24.7% by an "Investment
 25 Property," and 3.88% by a "Secondary Residence." CWALT 2004-30CB Pros. Sup. S-39.

26 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

27 (a) **Number of loans on which the owner of the property instructed tax**
 28 **authorities to send property tax bills to him or her at a different address: 366**

(b) Number of loans on which the owner of the property could have, but did not, designate the property as his or her homestead: 446

(c) Number of loans on which the owner of the property owned three or more properties: 37

(d) Number of loans that went straight from current to foreclosure or ownership by lender: 1

(e) Eliminating duplicates, number of loans about which one or more of statements (a) through (d) is true: 746

Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

On pages S-43 through S-48 of the prospectus supplement, Deutsche and CWALT made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

(a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower." CWALT 2004-30CB Pros. Sup. S-44.

(b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment ability and the value and adequacy of the mortgaged property as collateral." CWALT 2004-30CB Pros. Sup. S-44.

Item 106. Early payment defaults:

(a) Number of the mortgage loans that suffered EPDs: 13

(b) Percent of the mortgage loans that suffered EPDs: 0.2%

(c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that experienced EPDs: 0.14%

Item 107. 90+ days delinquencies:

(a) Number of the mortgage loans that suffered 90+ days delinquencies: 451

(b) Percent of the mortgage loans that suffered 90+ days delinquencies: 7.6%

(c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that suffered 90+ days delinquencies: 7.2%

Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:

On page S-3 of the prospectus supplement, Deutsche and CWALT made statements about the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by Standard & Poor's Rating Services.

Deutsche and CWALT also stated: "The classes of certificates listed below will not be offered unless they are assigned the following ratings by Standard & Poor's Ratings Services . . . and by Moody's Investors Service, Inc. ("Moody's")." The requirements for class 1-A-12, from which this certificate was to be paid, was for AAA from Standard & Poor's and Aaa from Moody's. CWALT 2004-30CB Pros. Sup. S-3.

Deutsche and CWALT also stated: "It is a condition to the issuance of the senior certificates that they be rated AAA by Standard & Poor's, a division of The McGraw-Hill Companies, Inc. ("S&P") and Aaa by Moody's Investors Service, Inc. ("Moody's")." CWALT 2004-30CB Pros. Sup. S-107.

Item 120. Summary of loans about which the Defendants made untrue or misleading statements:

(a) Number of loans whose LTVs were materially understated: 1,187

(b) Number of loans in which the owner's equity was reduced by 5% or more by undisclosed additional liens: 365

(c) Number of loans that suffered EPDs: 13

(d) Number of loans in which the properties were stated to be owner-occupied but were not: 746

(e) Eliminating duplicates, number of loans about which the Defendants made untrue or misleading statements: 1,941

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(f) **Eliminating duplicates, percent of loans about which the Defendants made untrue or misleading statements: 34.3%**

SCHEDULE 18 TO FIRST AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2007-16CB was a securitization in June 2007 of 7,330 mortgage loans, in five groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2007-16CB Pros. Sup. S-4, S-35, and S-41.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 1-A-1, for which the Bank paid \$183,548,250 plus accrued interest on June 29, 2007.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Certificate: 1-A-1: Standard & Poor's – AAA; Moody's – Aaa.

(e) **Current ratings of the certificate(s):** Certificate: 1-A-1: Standard & Poor's – CCC; Moody's – B3.

(f) **URL of prospectus supplement for this securitization:**
<http://www.sec.gov/Archives/edgar/data/1269518/000136231007001241/c70738e424b5.htm>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT, Inc. with the SEC on form S-3 on April 24, 2007. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

1 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

2 In the prospectus supplement, Deutsche and CWALT made the following statements
3 about the LTVs of the mortgage loans in the collateral pool of this securitization.

4 (a) The weighted-average original LTV of the mortgage loans in loan group 1 was
5 65.99%. CWALT 2007-16CB Pros. Sup. S-5.

6 (b) The weighted-average original LTV of the mortgage loans in loan group 2 was
7 67.24%. CWALT 2007-16CB Pros. Sup. S-5.

8 (c) The weighted-average original LTV of the mortgage loans in loan group 3 was
9 74.47%. CWALT 2007-16CB Pros. Sup. S-6.

10 (d) The weighted-average original LTV of the mortgage loans in loan group 4 was
11 66.97%. CWALT 2007-16CB Pros. Sup. S-6.

12 (e) The weighted-average original LTV of the mortgage loans in loan group 5 was
13 66.8%. CWALT 2007-16CB Pros. Sup. S-6.

14 (f) "No mortgage loan in any loan group had a Loan-to-Value Ratio at origination of
15 more than 100.00%." CWALT 2007-16CB Pros. Sup. S-37.

16 (g) In Annex A of the prospectus supplement ("The Mortgage Pool"), Deutsche and
17 CWALT presented tables of statistics about the mortgage loans in the collateral pool. CWALT
18 2007-16CB Pros. Sup. A-1 to A-47. Each table focused on a certain characteristic of the loans
19 (for example, current principal balance) and divided the loans into categories based on that
20 characteristic (for example, loans with current principal balances of \$0.01 to \$50,000, \$50,000.01
21 to \$100,000, \$100,000.01 to \$150,000, etc.). Among these data was the "Weighted Average
22 Original Loan-to-Value Ratio." There were 13 such tables for the loans in loan group 1. In each
23 table, the number of categories into which the loans were divided ranged from three to 39. Thus,
24 in Annex A, Deutsche and CWALT made hundreds of statements about the original LTVs of the
25 loans in loan group 1. CWALT 2007-16CB Pros. Sup. A-1 to A-10.

26 (h) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
27 mortgage loans in loan group 1 was approximately 65.99%." CWALT 2007-16CB Pros. Sup. A-

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1 (i) In Annex A, Deutsche and CWALT presented similar tables of statistics about the
2 mortgage loans in loan group 2. In these tables, Deutsche and CWALT similarly made hundreds
3 of statements about the original LTVs of the loans in loan group 2. CWALT 2007-16CB Pros.
4 Sup. A-11 to A-19.

5 (j) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
6 mortgage loans in loan group 2 was approximately 67.24%." CWALT 2007-16CB Pros. Sup. A-
7 14.

8 (k) In Annex A, Deutsche and CWALT presented similar tables of statistics about the
9 mortgage loans in loan group 3. In these tables, Deutsche and CWALT similarly made hundreds
10 of statements about the original LTVs of the loans in loan group 3. CWALT 2007-16CB Pros.
11 Sup. A-20 to A-29.

12 (l) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
13 mortgage loans in loan group 3 was approximately 74.47%." CWALT 2007-16CB Pros. Sup. A-
14 24.

15 (m) In Annex A, Deutsche and CWALT presented similar tables of statistics about the
16 mortgage loans in loan group 4. In these tables, Deutsche and CWALT similarly made hundreds
17 of statements about the original LTVs of the loans in loan group 4. CWALT 2007-16CB Pros.
18 Sup. A-30 to A-38.

19 (n) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
20 mortgage loans in loan group 4 was approximately 66.97%." CWALT 2007-16CB Pros. Sup. A-
21 33.

22 (o) In Annex A, Deutsche and CWALT presented similar tables of statistics about the
23 mortgage loans in loan group 5. In these tables, Deutsche and CWALT similarly made hundreds
24 of statements about the original LTVs of the loans in loan group 5. CWALT 2007-16CB Pros.
25 Sup. A-39 to A-47.

26 "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the mortgage loans
27 in loan group 5 was 66.8%." CWALT 2007-16CB Pros. Sup. A-42.

Item 62. Details of the results of the AVM analysis:

Number of loans	7,330
Number of properties on which there was enough information for the model to determine a true market value	4,182
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	2,860
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$208,623,473
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	420
Aggregate amount by which the true market values of those properties exceed their stated values	\$29,151,943
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	466
Weighted-average LTV, as stated by Defendants (group 1)	65.9%
Weighted-average LTV, as determined by the model (group 1)	76.7%

Item 65. Evidence from subsequent sales of refinanced properties:

Of the 7,330 mortgage loans in the collateral pool, 4,489 were taken out to refinance, rather than to purchase, properties. For those 4,489 loans, the value (denominator) in the LTV was an appraised value rather than a sale price. Of those 4,489 properties, 217 were subsequently sold for a total of approximately \$59,144,247. The total value ascribed to those same properties in the LTV data reported in the prospectus supplement and other documents sent to the Bank was \$86,529,500. Thus, those properties were sold for 68.4% of the value ascribed to them, a difference of 31.6%. This difference cannot be accounted for by declines in house prices in the areas in which those properties were located.

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans in this securitization originated or acquired by Countrywide: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2007-16CB Pros. Sup. S-43.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

(a) In Annex A of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2007-16CB Pros. Sup. A-8.

(b) In the "Occupancy Types" table, Deutsche and CWALT stated that 85.1% of the mortgage loans in loan group 1 were secured by a "Primary Residence," 14.14% by an "Investment Property," and 0.76% by a "Secondary Residence." CWALT 2007-16CB Pros. Sup. A-8.

(c) In Annex A, Deutsche and CWALT presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2007-16CB Pros. Sup. A-18.

(d) In the "Occupancy Types" table, Deutsche and CWALT stated that 79.94% of the mortgage loans in loan group 2 were secured by a "Primary Residence," 16.36% by an "Investment Property," and 3.7% by a "Secondary Residence." CWALT 2007-16CB Pros. Sup. A-18.

(e) In Annex A, Deutsche and CWALT presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 3 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and

1 misleading statements about the number of mortgage loans, the aggregate principal balance
2 outstanding, and the percent of aggregate principal balance outstanding in each of these
3 categories. CWALT 2007-16CB Pros. Sup. A-28.

4 (f) In the "Occupancy Types" table, Deutsche and CWALT stated that 72.89% of the
5 mortgage loans in loan group 3 were secured by a "Primary Residence," 17.21% by an
6 "Investment Property," and 9.9% by a "Secondary Residence." CWALT 2007-16CB Pros. Sup.
7 A-28.

8 (g) In Annex A, Deutsche and CWALT presented another table entitled "Occupancy
9 Types." This table divided the mortgage loans in loan group 4 into the categories "Primary
10 Residence," "Investment Property," and "Secondary Residence." The table made untrue and
11 misleading statements about the number of mortgage loans, the aggregate principal balance
12 outstanding, and the percent of aggregate principal balance outstanding in each of these
13 categories. CWALT 2007-16CB Pros. Sup. A-36.

14 (h) In the "Occupancy Types" table, Deutsche and CWALT stated that 86.18% of the
15 mortgage loans in loan group 4 were secured by a "Primary Residence," 12.94% by an
16 "Investment Property," and 0.88% by a "Secondary Residence." CWALT 2007-16CB Pros. Sup.
17 A-36.

18 (i) In Annex A, Deutsche and CWALT presented another table entitled "Occupancy
19 Types." This table divided the mortgage loans in loan group 5 into the categories "Primary
20 Residence," "Investment Property," and "Secondary Residence." The table made untrue and
21 misleading statements about the number of mortgage loans, the aggregate principal balance
22 outstanding, and the percent of aggregate principal balance outstanding in each of these
23 categories. CWALT 2007-16CB Pros. Sup. A-45.

24 (j) In the "Occupancy Types" table, Deutsche and CWALT stated that 85.99% of the
25 mortgage loans in loan group 5 were secured by a "Primary Residence," 9.19% by an "Investment
26 Property," and 4.82% by a "Secondary Residence." CWALT 2007-16CB Pros. Sup. A-45.

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1 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

- 2 (a) Number of loans on which the owner of the property instructed tax
3 authorities to send property tax bills to him or her at a different address: 567
4 (b) Number of loans on which the owner of the property could have, but did not,
5 designate the property as his or her homestead: 792
6 (c) Number of loans on which the owner of the property owned three or more
7 properties: 94
8 (d) Number of loans that went straight from current to foreclosure or ownership
9 by lender: 2
10 (e) Eliminating duplicates, number of loans about which one or more of
11 statements (a) through (d) is true: 1,305

12 **Item 99. Untrue or misleading statements about the underwriting standards of the**
13 **originators of the mortgage loans:**

14 On pages S-41 through S-47 of the prospectus supplement, Deutsche and CWALT made
15 statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those
16 statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

17 (a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made
18 if compensating factors are demonstrated by a prospective borrower." CWALT 2007-16CB Pros.
19 Sup. S-42.

20 (b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of
21 Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment
22 ability and the value and adequacy of the mortgaged property as collateral." CWALT 2007-16CB
23 Pros. Sup. S-42.

24 **Item 108. 30+ days delinquencies in this securitization:**

- 25 (a) Number of the mortgage loans that were 30+ days delinquent on March 31,
26 2010: 1,650
27 (b) Percent of the mortgage loans that were 30+ days delinquent on March 31,
28 2010: 22.5%

- 1 (c) **Percent of all mortgage loans in the United States that were 30+ days**
 2 **delinquent on March 31, 2010: 14.7%**

3 **Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:**

4 On page S-7 of the prospectus supplement, Deutsche and CWALT made statements about
 5 the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated
 6 that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by
 7 Standard & Poor's Rating Services. These were the highest ratings available from these two
 8 rating agencies.

9 Deutsche and CWALT also stated that: "The offered certificates will not be offered unless
 10 they are assigned the indicated ratings by Standard & Poor's . . . and Moody's Investors Service,
 11 Inc. ('Moody's')." CWALT 2007-16CB Pros. Sup. S-9.

12 Deutsche and CWALT also stated that: "It is a condition to the issuance of the offered
 13 certificates that they be assigned the respective ratings set forth in the Summary of this prospectus
 14 supplement." CWALT 2007-16CB Pros. Sup. S-133.

15 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
 16 **statements:**

- 17 (a) **Number of loans whose LTVs were materially understated: 2,860**
 18 (b) **Number of loans in which the properties were stated to be owner-occupied**
 19 **but were not: 1,305**
 20 (c) **Eliminating duplicates, number of loans about which the Defendants made**
 21 **untrue or misleading statements: 3,441**
 22 (d) **Eliminating duplicates, percent of loans about which the Defendants made**
 23 **untrue or misleading statements: 47.0%**

SCHEDULE 19 TO FIRST AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2007-2CB was a securitization in January 2007 of 4,274 mortgage loans, in two groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2007-2CB Pros. Sup. S-4, S-33 and S-39.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 1-A-5, for which The Bank paid \$64,725,781 plus accrued interest on January 30, 2007.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Certificate: 1-A-5: Standard & Poor's - AAA; Moody's - Aaa; Fitch - AAA.

(e) **Current ratings of the certificate(s):** Certificate: 1-A-5: Standard & Poor's - CCC; Moody's - Caa1; Fitch - CCC.

(f) **URL of prospectus supplement for this securitization:**
<http://www.sec.gov/Archives/edgar/data/1269518/000136231007001241/c70738e424b5.htm>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT, Inc. with the SEC on form S-3 on April 24, 2007. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

1 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

2 In the prospectus supplement, Deutsche and CWALT made the following statements
3 about the LTVs of the mortgage loans in the collateral pool of this securitization.

4 (a) The weighted-average original LTV of the mortgage loans in loan group 1 was
5 69.32%. CWALT 2007-2CB Pros. Sup. S-5.

6 (b) The weighted-average original LTV of the mortgage loans in loan group 2 was
7 68.37%. CWALT 2007-2CB Pros. Sup. S-5.

8 (c) "No mortgage loan in any loan group had a Loan-to-Value Ratio at origination or
9 on the closing date of more than 100.00%." CWALT 2007-2CB Pros. Sup. S-35.

10 (d) In Annex A of the prospectus supplement ("The Mortgage Pool"), Deutsche and
11 CWALT presented tables of statistics about the mortgage loans in the collateral pool. CWALT
12 2007-2CB Pros. Sup. A-1 to A-21. Each table focused on a certain characteristic of the loans (for
13 example, current principal balance) and divided the loans into categories based on that
14 characteristic (for example, loans with current principal balances of \$0.01 to \$50,000, \$50,000.01
15 to \$100,000, \$100,000.01 to \$150,000, etc.). Among these data was the "Weighted Average
16 Original Loan-to-Value Ratio" of the loans in each category. There were 13 such tables for the
17 loans in loan group 1. In each table, the number of categories into which the loans were divided
18 ranged from three to 67. Thus, in Annex A of the prospectus supplement, Deutsche and CWALT
19 made hundreds of statements about the original LTVs of the loans in loan group 1. CWALT
20 2007-2CB Pros. Sup. A-1 to A-10.

21 (e) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
22 mortgage loans in loan group 1 was approximately 69.32%." CWALT 2007-2CB Pros. Sup. A-5.

23 (f) In Annex A, Deutsche and CWALT presented similar tables of statistics about the
24 mortgage loans in loan group 2. In these tables, Deutsche and CWALT similarly made hundreds
25 of statements about the original LTVs of the loans in loan group 2. CWALT 2007-2CB Pros. Sup.
26 A-11 to A-21.

1 (g) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
2 mortgage loans in loan group 2 was approximately 68.37%." CWALT 2007-2CB Pros. Sup. A-
3 15.

4 **Item 62. Details of the results of the AVM analysis:**

5	Number of loans	4,274
6	Number of properties on which there was enough information for the model to determine a true market value	2,544
7	Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,608
8	Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$106,678,931
9	Number of loans on which the stated value was 95% or less of the true market value as reported by the model	301
10	Aggregate amount by which the true market values of those properties exceed their stated values	\$21,404,958
11	Number of loans with LTVs over 100%, as stated by Defendants	0
12	Number of loans with LTVs over 100%, as determined by the model	216
13	Weighted-average LTV, as stated by Defendants (group 1)	69.3%
14	Weighted-average LTV, as determined by the model (group 1)	78.4%

15 **Item 65. Evidence from subsequent sales of refinanced properties:**

16 Of the 4,274 mortgage loans in the collateral pool, 2,790 were taken out to refinance,
17 rather than to purchase, properties. For those 2,790 loans, the value (denominator) in the LTV
18 was an appraised value rather than a sale price. Of those 2,790 properties, 175 were subsequently
19 sold for a total of approximately \$47,677,016. The total value ascribed to those same properties in
20 the LTV data reported in the prospectus supplement and other documents sent to the Bank was
21 \$69,021,104. Thus, those properties were sold for 69.1% of the value ascribed to them, a
22 difference of 30.9%. This difference cannot be accounted for by declines in house prices in the
23 areas in which those properties were located.

24 **Item 82. Untrue or misleading statements about compliance with USPAP:**

25 In the prospectus supplement, Deutsche and CWALT made the following statement about
26 the appraisals of the properties that secured the mortgage loans originated by Countrywide: "All
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1 appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in
2 effect." CWALT 2007-2CB Pros. Sup. S-41.

3 **Item 88. Untrue or misleading statements about owner-occupancy of the properties**
4 **that secured the mortgage loans:**

5 In the prospectus supplement, Deutsche and CWALT made the following statements
6 about the occupancy status of the properties that secured the mortgage loans in the collateral pool
7 of this securitization.

8 (a) In Annex A of the prospectus supplement, described in Item 52, Deutsche and
9 CWALT presented a table entitled "Occupancy Types." This table divided the mortgage loans in
10 loan group 1 into the categories "Primary Residence," "Investment Property," and "Secondary
11 Residence." The table made untrue and misleading statements about the number of mortgage
12 loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance
13 outstanding in each of these categories. CWALT 2007-2CB Pros. Sup. A-8.

14 (b) In the "Occupancy Types" table, Deutsche and CWALT stated that 88.95% of the
15 mortgage loans in loan group 1 were secured by a "Primary Residence," 6.93% by an "Investment
16 Property," and 4.12% by a "Secondary Residence." CWALT 2007-2CB Pros. Sup. A-8.

17 (c) In Annex A, Deutsche and CWALT presented another table for the mortgage loans
18 in loan group 2. This table divided the mortgage loans in loan group 2 into the categories
19 "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue
20 and misleading statements about the number of mortgage loans, the aggregate principal balance
21 outstanding, and the percent of aggregate principal balance outstanding in each of these
22 categories. CWALT 2007-26CB Pros. Sup. A-19.

23 (d) In the "Occupancy Types" table, Deutsche and CWALT stated that 90.99% of the
24 mortgage loans in loan group 2 were secured by a "Primary Residence," 5.36% by an "Investment
25 Property," and 3.65% by a "Secondary Residence." CWALT 2007-2CB Pros. Sup. A-19.

26 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

27 (a) **Number of loans on which the owner of the property instructed tax**
28 **authorities to send property tax bills to him or her at a different address: 336**

(b) Number of loans on which the owner of the property could have, but did not, designate the property as his or her homestead: 509

(c) Number of loans on which the owner of the property owned three or more properties: 54

(d) Eliminating duplicates, number of loans about which one or more of statements (a) through (c) is true: 782

Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

On pages S-39 through S-45 of the prospectus supplement, Deutsche and CWALT made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

(a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower." CWALT 2007-2CB Pros. Sup. S-41.

(b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment ability and the value and adequacy of the mortgaged property as collateral." CWALT 2007-2CB Pros. Sup. S-40.

Item 108. 30+ days delinquencies in this securitization:

(a) Number of the mortgage loans that were 30+ days delinquent on March 31, 2010: 938

(b) Percent of the mortgage loans that were 30+ days delinquent on March 31, 2010: 21.9%

(c) Percent of all mortgage loans in the United States that were 30+ days delinquent on March 31, 2010: 14.7%

Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:

On page S-7 of the prospectus supplement, Deutsche and CWALT made statements about the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated

1 that the certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by Standard &
 2 Poor's Rating Services and Fitch. These were the highest ratings available from these [three]
 3 rating agencies.

4 Deutsche and CWALT also stated that: "The offered certificates will not be offered unless
 5 they are assigned the indicated ratings by Fitch Ratings ('Fitch'), Standard & Poor's . . . and
 6 Moody's Investors Service, Inc. ('Moody's')." CWALT 2007-2CB Pros. Sup. S-9.

7 Deutsche and CWALT also stated that: "It is a condition to the issuance of the offered
 8 certificates that they be assigned the respective ratings set forth in the Summary of this prospectus
 9 supplement." CWALT 2007-2CB Pros. Sup. S-130.

10 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
 11 **statements:**

- 12 (a) **Number of loans whose LTVs were materially understated: 1,608**
- 13 (b) **Number of loans in which the properties were stated to be owner-occupied**
 14 **but were not: 782**
- 15 (c) **Eliminating duplicates, number of loans about which the Defendants made**
 16 **untrue or misleading statements: 1,982**
- 17 (d) **Eliminating duplicates, percent of loans about which the Defendants made**
 18 **untrue or misleading statements: 46.6%**

SCHEDULE 20 TO FIRST AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2006-39CB was a securitization in November 2006 of 3,422 mortgage loans, in two groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2006-39CB Pros. Sup. S-4, S-33, and S-64.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 1-A-17, for which the Bank paid \$140,133,470 plus accrued interest on November 30, 2006.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Standard & Poor's – AAA; Moody's – Aaa; Fitch – AAA.

(e) **Current ratings of the certificate(s):** Standard & Poor's – CCC; Moody's – B3; Fitch – CC.

(f) **URL of prospectus supplement for this securitization:**
<http://www.sec.gov/Archives/edgar/data/1269518/000095012406007291/v25493b5e424b5.txt>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT, Inc. with the SEC on Form S-3 on March 6, 2006. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

1 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

2 In the prospectus supplement, Deutsche and CWALT made the following statements
3 about the LTVs of the mortgage loans in the collateral pool of this securitization.

4 (a) The weighted-average original LTV for the mortgage loans in loan group 1 was
5 67.3%. CWALT 2006-39CB Pros. Sup. S-6.

6 (b) The weighted-average original LTV for the mortgage loans in loan group 2 was
7 78.87%. CWALT 2006-39CB Pros. Sup. S-6.

8 (c) "No Initial Mortgage Loan in any loan group had a Loan-to-Value Ratio at
9 origination or on the closing date of more than 100.00%." CWALT 2006-39CB Pros. Sup. S-35.

10 (d) In the section of the prospectus supplement entitled "The Mortgage Pool,"
11 Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral
12 pool. CWALT 2006-39CB Pros. Sup. S-38 to S-60. Each table focused on a certain characteristic
13 of the loans (for example, current principal balance) and divided the loans into categories based
14 on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000,
15 \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data
16 about the loans in each category. Among these data was the "Weighted Average Original Loan-
17 to-Value Ratio." There were 13 such tables in "The Mortgage Pool" section of the prospectus
18 supplement for the loans in loan group 1. In each table, the number of categories into which the
19 loans were divided ranged from three to 77. Thus, in "The Mortgage Pool" section, Deutsche and
20 CWALT made hundreds of statements about the original LTVs of the loans in loan group 1.
21 CWALT 2006-39CB Pros. Sup. S-38 to S-47.

22 (e) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
23 of the Initial Mortgage Loans in loan group 1 was approximately 67.30%." CWALT 2006-39CB
24 Pros. Sup. S-42.

25 (f) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
26 of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT
27 similarly made hundreds of statements about the original LTVs of the loans in loan group 2.
28 CWALT 2006-39CB Pros. Sup. S-48 to S-60.

1 (g) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
 2 of the Initial Mortgage Loans in loan group 2 was approximately 78.87%." CWALT 2006-39CB
 3 Pros. Sup. S-54.

4 **Item 62. Details of the results of the AVM analysis:**

5	Number of loans	3,422
6	Number of properties on which there was enough information for the model to determine a true market value	2,138
7	Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,354
8	Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$82,141,819
9	Number of loans on which the stated value was 95% or less of the true market value as reported by the model	265
10	Aggregate amount by which the true market values of those properties exceed their stated values	\$15,554,558
11	Number of loans with LTVs over 100%, as stated by Defendants	0
12	Number of loans with LTVs over 100%, as determined by the model	201
13	Weighted-average LTV, as stated by Defendants (group 1)	67.3%
14	Weighted-average LTV, as determined by the model (group 1)	74.9%

15 **Item 65. Evidence from subsequent sales of refinanced properties:**

16 Of the 3,422 mortgage loans in the collateral pool, 1,908 were taken out to refinance,
 17 rather than to purchase, properties. For those 1,908 loans, the value (denominator) in the LTV
 18 was an appraised value rather than a sale price. Of those 1,908 properties, 162 were subsequently
 19 sold for a total of approximately \$46,582,786. The total value ascribed to those same properties in
 20 the LTV data reported in the prospectus supplement and other documents sent to the Bank was
 21 \$58,472,200. Thus, those properties were sold for 79.7% of the value ascribed to them, a
 22 difference of 20.3%. This difference cannot be accounted for by declines in house prices in the
 23 areas in which those properties were located.

24 **Item 82. Untrue or misleading statements about compliance with USPAP:**

25 In the prospectus supplement, Deutsche and CWALT made the following statement about
 26 the appraisals of the properties that secured the mortgage loans originated or acquired by
 27
 28

1 Countrywide: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal
2 standards then in effect." CWALT 2006-39CB Pros. Sup. S-66.

3 **Item 88. Untrue or misleading statements about owner-occupancy of the properties**
4 **that secured the mortgage loans:**

5 In the prospectus supplement, Deutsche and CWALT made the following statements
6 about the occupancy status of the properties that secured the mortgage loans in the collateral pool
7 of this securitization.

8 (a) In "The Mortgage Pool" section of the prospectus supplement, described in Item
9 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the
10 mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property,"
11 and "Secondary Residence." The table made untrue and misleading statements about the number
12 of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate
13 principal balance outstanding in each of these categories. CWALT 2006-39CB Pros. Sup. S-45.

14 (b) In the "Occupancy Types" table, Deutsche and CWALT stated that 87.97% of the
15 mortgage loans in loan group 1 were secured by a "Primary Residence," 7.71% by an "Investment
16 Property," and 4.32% by a "Secondary Residence." CWALT 2006-39CB Pros. Supl S-45.

17 (c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table
18 entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the
19 categories "Primary Residence," "Investment Property," and "Secondary Residence." The table
20 made untrue and misleading statements about the number of mortgage loans, the aggregate
21 principal balance outstanding, and the percent of aggregate principal balance outstanding in each
22 of these categories. CWALT 2006-39CB Pros. Sup. S-58.

23 (d) In the "Occupancy Types" table, Deutsche and CWALT stated that 69.24% of the
24 mortgage loans in loan group 2 were secured by a "Primary Residence," 25.61% by an
25 "Investment Property," and 5.15% by a "Secondary Residence." CWALT 2006-39CB Pros. Sup.
26 S-58.

27
28

1 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

- 2 (a) Number of loans on which the owner of the property instructed tax
3 authorities to send property tax bills to him or her at a different address: 294
4 (b) Number of loans on which the owner of the property could have, but did not,
5 designate the property as his or her homestead: 408
6 (c) Number of loans on which the owner of the property owned three or more
7 properties: 33
8 (d) Eliminating duplicates, number of loans about which one or more of
9 statements (a) through (c) is true: 640

10 **Item 99. Untrue or misleading statements about the underwriting standards of the**
11 **originators of the mortgage loans:**

12 On pages S-64 through S-70 of the prospectus supplement, Deutsche and CWALT made
13 statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those
14 statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

15 (a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made
16 if compensating factors are demonstrated by a prospective borrower." CWALT 2006-39CB Pros.
17 Sup. S-65.

18 (b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of
19 Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment
20 ability and the value and adequacy of the mortgaged property as collateral." CWALT 2006-39CB
21 Pros. Sup. S-65.

22 **Item 106. Early payment defaults:**

- 23 (a) Number of the mortgage loans that suffered EPDs: 37
24 (b) Percent of the mortgage loans that suffered EPDs: 1.1%
25 (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans
26 made at the same time as the loans in the collateral pool that experienced
27 EPDs: 0.44%
28

Item 107. 90+ days delinquencies:

- (a) Number of the mortgage loans that suffered 90+ days delinquencies: 1,048
- (b) Percent of the mortgage loans that suffered 90+ days delinquencies: 30.6%
- (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that suffered 90+ days delinquencies: 32.7%

Item 108. 30+ days delinquencies in this securitization:

- (a) Number of the mortgage loans that were 30+ days delinquent on March 31, 2010: 1,088
- (b) Percent of the mortgage loans that were 30+ days delinquent on March 31, 2010: 31.8%
- (c) Percent of all mortgage loans in the United States that were 30+ days delinquent on March 31, 2010: 14.7%

Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:

On pages S-7 through S-9 of the prospectus supplement, Deutsche and CWALT made statements about the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by Standard & Poor's Rating Services and Fitch. These were the highest ratings available from these three rating agencies.

Deutsche and CWALT also stated that: "The offered certificates will not be offered unless they are assigned the indicated ratings by Fitch Ratings ('Fitch'), Standard & Poor's . . . and Moody's Investors Service, Inc. ('Moody's')." CWALT 2006-39CB Pros. Sup. S-9.

Deutsche and CWALT also stated that: "It is a condition to the issuance of the offered certificates that they be assigned the respective ratings set forth in the Summary of this prospectus supplement." CWALT 2006-39CB Pros. Sup. S-150.

Item 120. Summary of loans about which the Defendants made untrue or misleading statements:

- (a) Number of loans whose LTVs were materially understated: 1,354**
- (b) Number of loans that suffered EPDs: 37**
- (c) Number of loans in which the properties were stated to be owner-occupied but were not: 640**
- (d) Eliminating duplicates, number of loans about which the Defendants made untrue or misleading statements: 1,667**
- (e) Eliminating duplicates, percent of loans about which the Defendants made untrue or misleading statements: 48.7%**

3428/001/X119858.v1

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14 Federal Home Loan Bank of San Francisco

15 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

18 FEDERAL HOME LOAN BANK OF SAN
19 FRANCISCO,

20 Plaintiff,

21 v.

22 CREDIT SUISSE SECURITIES (USA) LLC,
23 F/K/A CREDIT SUISSE FIRST BOSTON
LLC;

24 CREDIT SUISSE FIRST BOSTON

MORTGAGE SECURITIES CORP.;

25 DEUTSCHE BANK SECURITIES, INC.;

DEUTSCHE ALT-A SECURITIES, INC.;

26 J.P. MORGAN SECURITIES, INC., F/K/A

27 BEAR STEARNS & CO., INC.;

STRUCTURED ASSET MORTGAGE

28 INVESTMENTS II, INC.;

No. CGC-10-497840

**VOLUME 2 OF SCHEDULES OF
FIRST AMENDED COMPLAINT
(SCHEDULES 21-40)**

1 THE BEAR STEARNS COMPANIES, LLC,
2 F/K/A THE BEAR STEARNS COMPANIES,
3 INC.;
4 RBS SECURITIES, INC., F/K/A
5 GREENWICH CAPITAL MARKETS, INC.;
6 RBS ACCEPTANCE, INC. F/K/A
7 GREENWICH CAPITAL ACCEPTANCE,
8 INC.;
9 MORGAN STANLEY & CO.
10 INCORPORATED;
11 UBS SECURITIES, LLC;
12 MORTGAGE ASSET SECURITIZATION
13 TRANSACTIONS, INC.;
14 BANC OF AMERICA SECURITIES LLC;
15 BANC OF AMERICA FUNDING
16 CORPORATION;
17 BANC OF AMERICA MORTGAGE
18 SECURITIES, INC.;
19 COUNTRYWIDE SECURITIES
20 CORPORATION;
21 CWALT, INC.;
22 COUNTRYWIDE FINANCIAL
23 CORPORATION; AND,
24 DOES 1-50,

25
26
27
28
Defendants.

SCHEDULE 21 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2006-HY12 was a securitization in June 2006 of 1,962 mortgage loans, in one pool. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2006-HY12 Pros. Sup. S-4, S-24 and S-44.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche A-4, for which The Bank paid \$75,791,000 plus accrued interest on October 24, 2006.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Standard & Poor's – AAA; Moody's – Aaa.

(e) **Current ratings of the certificate(s):** Standard & Poor's – A+; Moody's – Ba1

(f) **URL of prospectus supplement for this securitization:**

<http://www.sec.gov/Archives/edgar/data/1269518/000095012906006888/v21593b5e424b5.txt>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT, Inc. with the SEC on Form S-3 on March 6, 2006. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the LTVs of the mortgage loans in the collateral pool of this securitization.

(a) The weighted-average original LTV of the mortgage loans in the collateral pool was 73.74%. CWALT 2006-HY12 Pros. Sup. S-5.

(b) "No Mortgage Loan will have had a Loan-to-Value Ratio at origination of more than 100.00%." CWALT 2006-HY12 Pros. Sup. S-26.

(c) In the section of the prospectus supplement entitled "The Mortgage Pool," Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral pool. Each table focused on a certain characteristic of the loans (for example, current principal balance) and divided the loans into categories based on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000, \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data about the loans in each category. Among these data was the "Weighted Average Original Loan-to-Value Ratio." There were 20 such tables in "The Mortgage Pool" section for all of the loans in the collateral pool. In each table, the number of categories into which the loans were divided ranged from three to 43. Thus, in "The Mortgage Pool" section, Deutsche and CWALT made hundreds of statements about the original LTVs of the loans in the collateral pool. CWALT 2006-HY12 Pros. Sup. S-28 to S-42.

(d) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the Mortgage Loans was approximately 73.74%." CWALT 2006-HY12 Pros. Sup. S-32.

Item 62. Details of the results of the AVM analysis:

Number of loans	1,962
Number of properties on which there was enough information for the model to determine a true market value	1,337
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	756
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$83,212,427
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	158
Aggregate amount by which the true market values of those properties exceed their stated values	\$15,004,843
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	122
Weighted-average LTV, as stated by Defendants	73.7%
Weighted-average LTV, as determined by the model	84.7%

Item 65. Evidence from subsequent sales of refinanced properties:

Of the 1,962 mortgage loans in the collateral pool, 812 were taken out to refinance, rather than to purchase, properties. For those 812 loans, the value (denominator) in the LTV was an appraised value rather than a sale price. Of those 812 properties, 111 were subsequently sold for a total of approximately \$53,740,941. The total value ascribed to those same properties in the LTV data reported in the prospectus supplement and other documents sent to the Bank was \$68,757,000. Thus, those properties were sold for 78.2% of the value ascribed to them, a difference of 21.8%. This difference cannot be accounted for by declines in house prices in the areas in which those properties were located.

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 198
- (b) Total reduction in equity from additional liens: \$18,949,238
- (c) Weighted-average reduction in equity from additional liens: 53.9%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans originated by Countrywide: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2006-HY12 Pros. Sup. S-46.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

- (a) In "The Mortgage Pool" section of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided all of the mortgage loans in the collateral pool into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of

1 aggregate principal balance outstanding in each of these categories. CWALT 2006-HY12 Pros.
2 Sup. S-36.

3 (b) In the "Occupancy Types" table, Deutsche and CWALT stated that 86.73% of the
4 mortgage loans in the collateral pool were secured by a "Primary Residence," 6.62% by an
5 "Investment Property," and 6.65% by a "Secondary Residence." CWALT 2006-HY12 Pros. Sup.
6 S-36.

7 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

8 (a) Number of loans on which the owner of the property instructed tax
9 authorities to send property tax bills to him or her at a different address: 149

10 (b) Number of loans on which the owner of the property could have, but did not,
11 designate the property as his or her homestead: 287

12 (c) Number of loans on which the owner of the property owned three or more
13 properties: 27

14 (d) Eliminating duplicates, number of loans about which one or more of
15 statements (a) through (c) is true: 402

16 **Item 99. Untrue or misleading statements about the underwriting standards of the**
17 **originators of the mortgage loans:**

18 On pages S-44 through S-49 of the prospectus supplement, Deutsche and CWALT made
19 statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those
20 statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

21 (a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made
22 if compensating factors are demonstrated by a prospective borrower." CWALT 2006-HY12 Pros.
23 Sup. S-45.

24 (b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of
25 Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment
26 ability and the value and adequacy of the mortgaged property as collateral." CWALT 2006-HY12
27 Pros. Sup. S-45.

Item 107. 90+ days delinquencies:**(a) Number of the mortgage loans that suffered 90+ days delinquencies: 601****(b) Percent of the mortgage loans that suffered 90+ days delinquencies: 30.6%****(c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that suffered 90+ days delinquencies: 32.7%****Item 108. 30+ days delinquencies in this securitization:****(a) Number of the mortgage loans that were 30+ days delinquent on March 31, 2010: 634****(b) Percent of the mortgage loans that were 30+ days delinquent on March 31, 2010: 32.3%****(c) Percent of all mortgage loans in the United States that were 30+ days delinquent on March 31, 2010: 14.7%****Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:**

On page S-6 of the prospectus supplement, Deutsche and CWALT made statements about the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated that the Bank's certificate was rated Aaa by Moody's Investors Services, Inc. and AAA by Standard & Poor's Rating Services. These were the highest ratings available from these two agencies.

Deutsche and CWALT also stated that: "The offered certificates will not be offered unless they are assigned the indicated ratings by Standard & Poor's, a division of The McGraw-Hill Companies, Inc. ('S&P') and Moody's Investors Service, Inc. ('Moody's')." CWALT 2006-HY12 Pros. Sup. S-6.

Deutsche and CWALT also stated that: "It is a condition to the issuance of the senior certificates that they be rated AAA by Standard & Poor's' . . . and Aaa by Moody's Investors Service, Inc. ('Moody's')." CWALT 2006-HY12 Pros. Sup. S-102.

1 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
2 **statements:**

3 (a) **Number of loans whose LTVs were materially understated: 756**

4 (b) **Number of loans in which the owner's equity was reduced by 5% or more by**
5 **undisclosed additional liens: 198**

6 (c) **Number of loans in which the properties were stated to be owner-occupied**
7 **but were not: 402**

8 (d) **Eliminating duplicates, number of loans about which the Defendants made**
9 **untrue or misleading statements: 1,061**

10 (e) **Eliminating duplicates, percent of loans about which the Defendants made**
11 **untrue or misleading statements: 54.1%**

SCHEDULE 22 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) Dealer that sold the certificate(s) to the Bank: Deutsche.

(b) Description of the trust: Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2006-HY3 was a securitization in February 2006 of 404 mortgage loans, in three groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2006-HY3 Pros. Sup. S-3, S-21, and S-62.

(c) Description of the certificate(s) that the Bank purchased: Deutsche offered and sold to the Bank senior certificates in this securitization, in tranche 1-A-1 and tranche 2-A-1, for which the Bank paid \$76,097,998 and \$82,392,793 plus accrued interest, respectively, on February 28, 2006.

(d) Ratings of the certificate(s) when the Bank purchased them:

Certificate: 1-A-1: Standard & Poor's – AAA; Moody's – Aaa.

Certificate: 2-A-1: Standard & Poor's – AAA; Moody's – Aaa.

(e) Current ratings of the certificate(s):

Certificate: 1-A-1: Standard & Poor's – CCC; Moody's – Caa2.

Certificate: 2-A-1: Standard & Poor's – CCC; Moody's – Caa2.

(f) URL of prospectus supplement for this securitization:

<http://www.sec.gov/Archives/edgar/data/1269518/000095012906001931/v17513b5e424b5.txt>

(g) Registration statement pursuant or traceable to which the certificate(s) were issued: Certificates in this trust, including the certificates that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT, Inc. with the SEC on form S-3 on July 25, 2005. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the LTVs of the mortgage loans in the collateral pool of this securitization.

(a) The weighted-average original LTV of the mortgage loans in loan group 1 was 75.48%. CWALT 2006-HY3 Pros. Sup. S-4.

(b) The weighted-average original LTV of the mortgage loans in loan group 2 was 73.89%. CWALT 2006-HY3 Pros. Sup. S-4.

(c) The weighted-average original LTV of the mortgage loans in loan group 3 was 72.44%. CWALT 2006-HY3 Pros. Sup. S-4.

(d) "No Mortgage Loan will have had a Loan-to-Value Ratio at origination of more than 90.00%." CWALT 2006-HY3 Pros. Sup. S-24.

(e) In the section of the prospectus supplement entitled "The Mortgage Pool," Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral pool. CWALT 2006-HY3 Pros. Sup. S-26 to S-60. Each table focused on a certain characteristic of the loans (for example, current principal balance) and divided the loans into categories based on that characteristic (for example, loans with current principal balances of \$400,000.01 to \$450,000, \$450,000.01 to \$500,000, \$500,000.01 to \$550,000, etc.). Each table then presented various data about the loans in each category. Among these data was the "Weighted Average Original Loan-to-Value Ratio." There were 20 such tables in "The Mortgage Pool" section for the loans in loan group 1. In each table, the number of categories into which the loans were divided ranged from one to 27. Thus, in "The Mortgage Pool" section, Deutsche and CWALT made hundreds of statements about the original LTVs of the loans in loan group 1. CWALT 2006-HY3 Pros. Sup. S-26 to S-38.

(f) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the group 1 mortgage loans was approximately 75.48%." CWALT 2006-HY3 Pros. Sup. S-29.

(g) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT

1 similarly made hundreds of statements about the original LTVs of the loans in loan group 2.
 2 CWALT 2006-HY3 Pros. Sup. S-39 to S-49.

3 (h) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
 4 group 2 mortgage loans was approximately 73.89%." CWALT 2006-HY3 Pros. Sup. S-42.

5 (i) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
 6 of statistics about the mortgage loans in loan group 3. In these tables, Deutsche and CWALT
 7 similarly made hundreds of statements about the original LTVs of the loans in loan group 3.
 8 CWALT 2006-HY3 Pros. Sup. S-50 to S-59.

9 (j) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
 10 group 3 mortgage loans was approximately 72.44%." CWALT 2006-HY3 Pros. Sup. S-53.

11 **Item 62. Details of the results of the AVM analysis:**

12	Number of loans	404
13	Number of properties on which there was enough information for the model to determine a true market value	236
14	Number of loans on which the stated value was 105% or more of the true market value as reported by the model	141
15	Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$25,240,539
16	Number of loans on which the stated value was 95% or less of the true market value as reported by the model	23
17	Aggregate amount by which the true market values of those properties exceed their stated values	\$3,344,524
18	Number of loans with LTVs over 100%, as stated by Defendants	0
19	Number of loans with LTVs over 100%, as determined by the model	35
20	Weighted-average LTV, as stated by Defendants (group 1)	75.5%
21	Weighted-average LTV, as determined by the model (group 1)	91.3%

22 **Item 65. Evidence from subsequent sales of refinanced properties:**

23 Of the 404 mortgage loans in the collateral pool, 140 were taken out to refinance, rather
 24 than to purchase, properties. For those 140 loans, the value (denominator) in the LTV was an
 25 appraised value rather than a sale price. Of those 140 properties, 21 were subsequently sold for a
 26 total of approximately \$14,890,875. The total value ascribed to those same properties in the LTV
 27 data reported in the prospectus supplement and other documents sent to the Bank was
 28 \$20,611,000. Thus, those properties were sold for 72.2% of the value ascribed to them, a

1 difference of 27.8%. This difference cannot be accounted for by declines in house prices in the
2 areas in which those properties were located.

3 **Item 71. Undisclosed additional liens:**

- 4 (a) **Minimum number of properties with additional liens: 35**
5 (b) **Total reduction in equity from additional liens: \$4,543,682**
6 (c) **Weighted-average reduction in equity from additional liens: 61.2%**

7 **Item 82. Untrue or misleading statements about compliance with USPAP:**

8 In the prospectus supplement, Deutsche and CWALT made the following statement about
9 the appraisals of the properties that secured the mortgage loans originated by Countrywide: "All
10 appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in
11 effect." CWALT 2006-HY3 Pros. Sup. S-64.

12 **Item 88. Untrue or misleading statements about owner-occupancy of the properties**
13 **that secured the mortgage loans:**

14 In the prospectus supplement, Deutsche and CWALT made the following statements
15 about the occupancy status of the properties that secured the mortgage loans in the collateral pool
16 of this securitization.

17 (a) In "The Mortgage Pool" section of the prospectus supplement, described in Item
18 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the
19 mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property,"
20 and "Secondary Residence." The table made untrue and misleading statements about the number
21 of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate
22 principal balance outstanding in each of these categories. CWALT 2006-HY3 Pros. Sup. S-32.

23 (b) In the "Occupancy Types" table, Deutsche and CWALT stated that 83.44% of the
24 mortgage loans in loan group 1 were secured by a "Primary Residence," 10.24% by an
25 "Investment Property," and 6.31% by a "Secondary Residence." CWALT 2006-HY3 Pros. Sup.
26 S-32.

27 (c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table
28 entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the

categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2006-HY3 Pros. Sup. S-44.

(d) In the "Occupancy Types" table, Deutsche and CWALT stated that 80.16% of the mortgage loans in loan group 2 were secured by a "Primary Residence," 13.44% by an "Investment Property," and 6.39% by a "Secondary Residence." CWALT 2006-HY3 Pros. Sup. S-44.

(e) In "The Mortgage Pool" section, Deutsche and CWALT presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 3 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2006-HY3 Pros. Sup. S-55.

(f) In the "Occupancy Types" table, Deutsche and CWALT stated that 72.38% of the mortgage loans in loan group 3 were secured by a "Primary Residence," 9.27% by an "Investment Property," and 18.35% by a "Secondary Residence." CWALT 2006-HY3 Pros. Sup. S-55.

Item 96. Details of properties that were stated to be owner-occupied, but were not:

- (a) Number of loans on which the owner of the property instructed tax authorities to send property tax bills to him or her at a different address: 29
- (b) Number of loans on which the owner of the property could have, but did not, designate the property as his or her homestead: 65
- (c) Number of loans on which the owner of the property owned three or more properties: 3
- (d) Eliminating duplicates, number of loans about which one or more of statements (a) through (c) is true: 81

Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

On pages S-62 through S-67 of the prospectus supplement, Deutsche and CWALT made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

(a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower." CWALT 2006-HY3 Pros. Sup. S-63.

(b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment ability and the value and adequacy of the mortgaged property as collateral." CWALT 2006-HY3 Pros. Sup. S-63.

Item 106. Early payment defaults:

(a) Number of the mortgage loans that suffered EPDs: 4

(b) Percent of the mortgage loans that suffered EPDs: 1.0%

(c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that experienced EPDs: 0.44%

Item 107. 90+ days delinquencies:

(a) Number of the mortgage loans that suffered 90+ days delinquencies: 158

(b) Percent of the mortgage loans that suffered 90+ days delinquencies: 39.1%

(c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that suffered 90+ days delinquencies: 32.7%

Item 108. 30+ days delinquencies in this securitization:

(a) Number of the mortgage loans that were 30+ days delinquent on March 31, 2010: 155

1 (b) Percent of the mortgage loans that were 30+ days delinquent on March 31,
2 2010: 38.4%

3 (c) Percent of all mortgage loans in the United States that were 30+ days
4 delinquent on March 31, 2010: 14.7%

5 **Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:**

6 On page S-6 of the prospectus supplement, Deutsche and CWALT made statements about
7 the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated
8 that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by
9 Standard & Poor's Rating Services. These were the highest ratings available from these two
10 rating agencies.

11 Deutsche and CWALT also stated that: "The offered certificates will not be offered unless
12 they are assigned the indicated ratings by Standard & Poor's, a division of The McGraw-Hill
13 Companies, Inc. ('S&P') and Moody's Investors Service, Inc. ('Moody's')." CWALT 2006-HY3
14 Pros. Sup. S-6.

15 Deutsche and CWALT also stated that: "It is a condition to the issuance of the senior
16 certificates that they be rated AAA by Standard & Poor's . . . and Aaa by Moody's Investors
17 Service, Inc. ('Moody's')." CWALT 2006-HY3 Pros. Sup. S-109.

18 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
19 **statements:**

20 (a) Number of loans whose LTVs were materially understated: 141

21 (b) Number of loans in which the owner's equity was reduced by 5% or more by
22 undisclosed additional liens: 35

23 (c) Number of loans that suffered EPDs: 4

24 (d) Number of loans in which the properties were stated to be owner-occupied
25 but were not: 81

26 (e) Eliminating duplicates, number of loans about which the Defendants made
27 untrue or misleading statements: 200

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(f) **Eliminating duplicates, percent of loans about which the Defendants made untrue or misleading statements: 49.5%**

SCHEDULE 23 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2005-84 was a securitization in December 2005 of 4,403 mortgage loans, in four groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2005-84 Pros. Sup. S-4, S-14, and S-73.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 3-A-1, for which the Bank paid \$112,121,360 plus accrued interest on December 30, 2005.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Standard & Poor's – AAA; Moody's – Aaa.

(e) **Current ratings of the certificate(s):** Standard & Poor's – CCC; Moody's – Caa3.

(f) **URL of prospectus supplement for this securitization:**
<http://www.sec.gov/Archives/edgar/data/1269518/000095012905012300/v15558e424b5.txt>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT with the SEC on form S-3 on July 25, 2005. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the LTVs of the mortgage loans in the collateral pool of this securitization.

1 (a) "No Mortgage Loan will have had a Loan-to-Value Ratio at origination of more
2 than 95.00%." CWALT 2005-84 Pros. Sup. S-16.

3 (b) In the section of the prospectus supplement entitled "The Mortgage Pool,"
4 Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral
5 pool. CWALT 2005-84 Pros. Sup. S-18 to S-71. Each table focused on a certain characteristic of
6 the loans (for example, current principal balance) and divided the loans into categories based on
7 that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000,
8 \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data
9 about the loans in each category. Among these data was the "Weighted Average Original Loan-
10 to-Value Ratio." There were 18 such tables in "The Mortgage Pool" section for the mortgage
11 loans in loan group 1. In each table, the number of categories into which the loans were divided
12 ranged from one to 55. Thus, in "The Mortgage Pool" section, Deutsche and CWALT made
13 hundreds of statements about the original LTVs of the loans in loan group 1. CWALT 2005-84
14 Pros. Sup. S-18 to S-30.

15 (c) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
16 group 1 mortgage loans was approximately 77.08%." CWALT 2005-84 Pros. Sup. S-22.

17 (d) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
18 of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT
19 similarly made hundreds of statements about the original LTVs of the loans in loan group 2.
20 CWALT 2005-84 Pros. Sup. S-31 to S-45.

21 (e) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
22 group 2 mortgage loans was approximately 77.05%." CWALT 2005-84 Pros. Sup. S-36.

23 (f) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
24 of statistics about the mortgage loans in loan group 3. In these tables, Deutsche and CWALT
25 similarly made hundreds of statements about the original LTVs of the loans in loan group 3.
26 CWALT 2005-84 Pros. Sup. S-46 to S-58.

27 (g) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
28 group 3 mortgage loans was approximately 76.54%." CWALT 2005-84 Pros. Sup. S-50.

(h) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables of statistics about the mortgage loans in loan group 4. In these tables, Deutsche and CWALT similarly made hundreds of statements about the original LTVs of the loans in loan group 4. CWALT 2005-84 Pros. Sup. S-59 to S-71.

(i) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the group 4 mortgage loans was approximately 74.66%." CWALT 2005-84 Pros. Sup. S-63.

Item 62. Details of the results of the AVM analysis:

Number of loans	4,403
Number of properties on which there was enough information for the model to determine a true market value	2,868
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,552
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$77,718,118
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	372
Aggregate amount by which the true market values of those properties exceed their stated values	\$17,658,847
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	222
Weighted-average LTV, as stated by Defendants (group 3)	76.5%
Weighted-average LTV, as determined by the model (group 3)	82.8%

Item 65. Evidence from subsequent sales of refinanced properties:

Of the 4,403 mortgage loans in the collateral pool, 1,506 were taken out to refinance, rather than to purchase, properties. For those 1,506 loans, the value (denominator) in the LTV was an appraised value rather than a sale price. Of those 1,506 properties, 234 were subsequently sold for a total of approximately \$56,316,110. The total value ascribed to those same properties in the LTV data reported in the prospectus supplement and other documents sent to the Bank was \$76,037,500. Thus, those properties were sold for 74.1% of the value ascribed to them, a difference of 25.9%. This difference cannot be accounted for by declines in house prices in the areas in which those properties were located.

Item 71. Undisclosed additional liens:

(a) Minimum number of properties with additional liens: 298

(b) **Total reduction in equity from additional liens: \$15,774,331**

(c) Weighted-average reduction in equity from additional liens: 67.4%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans originated by Countrywide: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2005-84 Pros. Sup. S-75.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

(a) In "The Mortgage Pool" section of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-84 Pros. Supp. S-25.

(b) In the "Occupancy Types" table, Deutsche and CWALT stated that 81.72% of the mortgage loans in loan group 1 were secured by a "Primary Residence," 8.54% by an "Investment Property," and 9.74% by a "Secondary Residence." CWALT 2005-84 Pros. Sup. S-25.

(c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-84 Pros. Sup. S-39.

(d) In the "Occupancy Types" table, Deutsche and CWALT stated that 81.94% of the mortgage loans in loan group 2 were secured by a "Primary Residence," 5.53% by an "Investment Property," and 12.54% by a "Secondary Residence." CWALT 2005-84 Pros. Sup. S-39.

(e) In "The Mortgage Pool" section, Deutsche and CWALT presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 3 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-84 Pros. Sup. S-53.

(f) In the "Occupancy Types" table, Deutsche and CWALT stated that 83.8% of the mortgage loans in loan group 3 were secured by a "Primary Residence," 4.77% by an "Investment Property," and 11.44% by a "Secondary Residence." CWALT 2005-84 Pros. Sup. S-53.

(g) In "The Mortgage Pool" section, Deutsche and CWALT presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 4 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-84 Pros. Sup. S-66.

(h) In the "Occupancy Types" table, Deutsche and CWALT stated that 77.69% of the mortgage loans in loan group 4 were secured by a "Primary Residence," 11.44% by an "Investment Property," and 10.87% by a "Secondary Residence." CWALT 2005-84 Pros. Sup. S-66.

Item 96. Details of properties that were stated to be owner-occupied, but were not:

- (a) **Number of loans on which the owner of the property instructed tax authorities to send property tax bills to him or her at a different address: 393**
- (b) **Number of loans on which the owner of the property could have, but did not, designate the property as his or her homestead: 576**

- 1 (c) Number of loans on which the owner of the property owned three or more
- 2 properties: 17
- 3 (d) Number of loans that went straight from current to foreclosure or ownership
- 4 by lender: 1
- 5 (e) Eliminating duplicates, number of loans about which one or more of
- 6 statements (a) through (d) is true: 814

7 **Item 99. Untrue or misleading statements about the underwriting standards of the**
 8 **originators of the mortgage loans:**

9 On pages S-73 through S-78 of the prospectus supplement, Deutsche and CWALT made
 10 statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those
 11 statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

12 (a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made
 13 if compensating factors are demonstrated by a prospective borrower." CWALT 2005-84 Pros.
 14 Sup. S-74.

15 (b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of
 16 Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment
 17 ability and the value and adequacy of the mortgaged property as collateral." CWALT 2005-84
 18 Pros. Sup. S-74.

19 **Item 106. Early payment defaults:**

- 20 (a) Number of the mortgage loans that suffered EPDs: 15
- 21 (b) Percent of the mortgage loans that suffered EPDs: 0.3%
- 22 (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans
- 23 made at the same time as the loans in the collateral pool that experienced
- 24 EPDs: 0.18%

25 **Item 107. 90+ days delinquencies:**

- 26 (a) Number of the mortgage loans that suffered 90+ days delinquencies: 1,344
- 27 (b) Percent of the mortgage loans that suffered 90+ days delinquencies: 30.5%

- 1 (c) **Percent of all securitized, non-agency prime (including Alt-A) mortgage loans**
 2 **made at the same time as the loans in the collateral pool that suffered 90+**
 3 **days delinquencies: 16.5%**

4 **Item 108. 30+ days delinquencies in this securitization:**

- 5 (a) **Number of the mortgage loans that were 30+ days delinquent on March 31,**
 6 **2010: 1,373**
- 7 (b) **Percent of the mortgage loans that were 30+ days delinquent on March 31,**
 8 **2010: 31.2%**
- 9 (c) **Percent of all mortgage loans in the United States that were 30+ days**
 10 **delinquent on March 31, 2010: 14.7%**

11 **Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:**

12 On page S-3 of the prospectus supplement, Deutsche and CWALT made statements about
 13 the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated
 14 that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by
 15 Standard & Poor's Rating Services. These were the highest ratings available from these two
 16 rating agencies.

17 Deutsche and CWALT also stated that: "The classes of certificates listed below will not
 18 be offered unless they receive the respective ratings at least as high as those set forth below from
 19 Standard & Poor's . . . and from Moody's Investors Service, Inc. ('Moody's')." The requirements
 20 for class 3-A-1, from which this certificate was to be paid, was AAA for Standard & Poor's and
 21 Aaa for Moody's. CWALT 2005-84 Pros. Sup. S-3.

22 Deutsche and CWALT also stated that: "It is a condition to the issuance of the senior
 23 certificates that they be rated AAA by Standard & Poor's . . . and Aaa by Moody's Investors
 24 Service, Inc. ('Moody's')." CWALT 2005-84 Pros. Sup. S-112.

25 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
 26 **statements:**

- 27 (a) **Number of loans whose LTVs were materially understated: 1,552**
 28

- 1 **(b) Number of loans in which the owner's equity was reduced by 5% or more by**
2 **undisclosed additional liens: 298**
- 3 **(c) Number of loans that suffered EPDs: 15**
- 4 **(d) Number of loans in which the properties were stated to be owner-occupied**
5 **but were not: 814**
- 6 **(e) Eliminating duplicates, number of loans about which the Defendants made**
7 **untrue or misleading statements: 2,160**
- 8 **(f) Eliminating duplicates, percent of loans about which the Defendants made**
9 **untrue or misleading statements: 49.1%**
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SCHEDULE 24 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2005-85CB was a securitization in December 2005 of 5,378 mortgage loans,¹ in three groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2005-85CB Pros. Sup. S-4, S-15, and S-45.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 2-A-1, for which the Bank paid \$247,714,844 plus accrued interest on December 30, 2005.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Standard & Poor's – AAA; Moody's – Aaa.

(e) **Current ratings of the certificate(s):** Standard & Poor's – AA-; Moody's – Aa1.

(f) **URL of prospectus supplement for this securitization:**
<http://www.sec.gov/Archives/edgar/data/1269518/000095012905012354/v15566e424b5.txt>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT with the SEC on form S-3 on July 25, 2005. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

¹ CWALT 2005-85CB was a prefunded securitization. On the closing date of the securitization there were 5,378 mortgage loans in the trust. After the closing date of the securitization, the trust purchased an additional 1,305 mortgage loans.

Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the LTVs of the mortgage loans in the collateral pool of this securitization.

(a) "No Initial Mortgage Loan in any loan group had a Loan-to-Value Ratio at origination of more than 100.00%." CWALT 2005-85CB Pros. Sup. S-16.

(b) In the section of the prospectus supplement entitled "The Mortgage Pool," Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral pool. CWALT 2005-85CB Pros. Sup. S-18 to S-41. Each table focused on a certain characteristic of the loans (for example, current principal balance) and divided the loans into categories based on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000, \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data about the loans in each category. Among these data was the "Weighted Average Original Loan-to-Value Ratio." There were 10 such tables in "The Mortgage Pool" section for the loans in loan group 1. In each table, the number of categories into which the loans were divided ranged from two to 25. Thus, in "The Mortgage Pool" section, Deutsche and CWALT made hundreds of statements about the original LTVs of the loans in loan group 1. CWALT 2005-85CB Pros. Sup. S-18 to S-25.

(c) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio of the Initial Mortgage Loans in loan group 1 is approximately 73.49%." CWALT 2005-85CB Pros. Sup. S-21.

(d) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT similarly made hundreds of statements about the original LTVs of the loans in loan group 2. CWALT 2005-85CB Pros. Sup. S-26 to S-34.

(e) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio of the Initial Mortgage Loans in loan group 2 is approximately 69.35%." CWALT 2005-85CB Pros. Sup. S-30.

(f) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables of statistics about the mortgage loans in loan group 3. In these tables, Deutsche and CWALT similarly made hundreds of statements about the original LTVs of the loans in loan group 3. CWALT 2005-85CB Pros. Sup. S-35 to S-40.

(g) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio of the Initial Mortgage Loans in loan group 3 is approximately 53.78%." CWALT 2005-85CB Pros. Sup. S-38.

Item 62. Details of the results of the AVM analysis:

Number of loans	6,683
Number of properties on which there was enough information for the model to determine a true market value	3,606
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,953
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$97,023,746
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	605
Aggregate amount by which the true market values of those properties exceed their stated values	\$31,773,088
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	232
Weighted-average LTV, as stated by Defendants (group 2)	69.4%
Weighted-average LTV, as determined by the model (group 2)	75.4%

Item 65. Evidence from subsequent sales of refinanced properties:

Of the 6,683 mortgage loans in the collateral pool, 2,957 were taken out to refinance, rather than to purchase, properties. For those 2,957 loans, the value (denominator) in the LTV was an appraised value rather than a sale price. Of those 2,957 properties, 310 were subsequently sold for a total of approximately \$82,323,303. The total value ascribed to those same properties in the LTV data reported in the prospectus supplement and other documents sent to the Bank was \$95,565,426. Thus, those properties were sold for 86.1% of the value ascribed to them, a difference of 13.9%. This difference cannot be accounted for by declines in house prices in the areas in which those properties were located.

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 374
- (b) Total reduction in equity from additional liens: \$21,376,236
- (c) Weighted-average reduction in equity from additional liens: 76.7%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans in this securitization: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2005-85CB Pros. Sup. S-46 to S-47.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

(a) In "The Mortgage Pool" section of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-85CB Pros. Sup. S-24.

(b) In the "Occupancy Types" table, Deutsche and CWALT stated that 79.26% of the mortgage loans in loan group 1 were secured by a "Primary Residence," 15.15% by an "Investment Property," and 5.59% by a "Secondary Residence." CWALT 2005-85CB Pros. Sup. S-24.

(c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate

1 principal balance outstanding, and the percent of aggregate principal balance outstanding in each
2 of these categories. CWALT 2005-85CB Pros. Sup. S-33.

3 (d) In the "Occupancy Types" table, Deutsche and CWALT stated that 88.37% of the
4 mortgage loans in loan group 2 were secured by a "Primary Residence," 6.26% by an "Investment
5 Property," and 5.37% by a "Secondary Residence." CWALT 2005-85CB Pros. Sup. S-33.

6 (e) In "The Mortgage Pool" section, Deutsche and CWALT presented another table
7 entitled "occupancy Types." This table divided the mortgage loans in loan group 3 into the
8 categories "Primary Residence," "Investment Property," and "Secondary Residence." The table
9 made untrue and misleading statements about the number of mortgage loans, the aggregate
10 principal balance outstanding, and the percent of aggregate principal balance outstanding in each
11 of these categories. CWALT 2005-85CB Pros. Sup. S-41.

12 (f) In the "Occupancy Types" table, Deutsche and CWALT stated that 82.13% of the
13 mortgage loans in loan group 3 were secured by a "Primary Residence," 10.01% by an
14 "Investment Property," and 7.86% by a "Secondary Residence." CWALT 2005-85CB Pros. Sup.
15 S-41.

16 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

- 17 (a) Number of loans on which the owner of the property instructed tax
18 authorities to send property tax bills to him or her at a different address: 495
- 19 (b) Number of loans on which the owner of the property could have, but did not,
20 designate the property as his or her homestead: 625
- 21 (c) Number of loans on which the owner of the property owned three or more
22 properties: 38
- 23 (d) Eliminating duplicates, number of loans about which one or more of
24 statements (a) through (c) is true: 1,025
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Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

On pages S-45 through S-50 of the prospectus supplement, Deutsche and CWALT made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

(a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower." CWALT 2005-85CB Pros. Sup. S-46.

(b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment ability and the value and adequacy of the mortgaged property as collateral." CWALT 2005-85CB Pros. Sup. S-46.

Item 106. Early payment defaults:

(a) **Number of the mortgage loans that suffered EPDs: 15**

(b) **Percent of the mortgage loans that suffered EPDs: 0.2%**

(c) **Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that experienced EPDs: 0.18%**

Item 107. 90+ days delinquencies:

(a) **Number of the mortgage loans that suffered 90+ days delinquencies: 1,038**

(b) **Percent of the mortgage loans that suffered 90+ days delinquencies: 15.5%**

(c) **Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that suffered 90+ days delinquencies: 16.5%**

Item 108. 30+ days delinquencies in this securitization:

(a) **Number of the mortgage loans that were 30+ days delinquent on March 31, 2010: 1,128**

(b) Percent of the mortgage loans that were 30+ days delinquent on March 31, 2010: 16.9%

(c) Percent of all mortgage loans in the United States that were 30+ days delinquent on March 31, 2010: 14.7%

Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:

On page S-3 of the prospectus supplement, Deutsche and CWALT made statements about the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by Standard & Poor's Rating Services.

Deutsche and CWALT also stated that: "The classes of certificates listed below will not be offered unless they are assigned the following ratings by Standard & Poor's . . . and Moody's Investors Service, Inc. ('Moody's')." The requirements for class 2-A-1, from which this certificate was to be paid, was for AAA from Standard & Poor's and Aaa from Moody's. CWALT 2005-85CB Pros. Sup. S-3.

Deutsche and CWALT also stated that: "It is a condition to the issuance of the senior certificates that they be rated 'AAA' each by Standard & Poor's . . . and 'Aaa' by Moody's Investors Service, Inc. ('Moody's')." CWALT 2005-85CB Pros. Sup. S-97.

Item 120. Summary of loans about which the Defendants made untrue or misleading statements:

(a) Number of loans whose LTVs were materially understated: 1,953

(b) Number of loans in which the owner's equity was reduced by 5% or more by undisclosed additional liens: 374

(c) Number of loans that suffered EPDs: 15

(d) Number of loans in which the properties were stated to be owner-occupied but were not: 1,025

(e) Eliminating duplicates, number of loans about which the Defendants made untrue or misleading statements: 2,846

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(f) **Eliminating duplicates, percent of loans about which the Defendants made untrue or misleading statements: 42.6%**

SCHEDULE 25 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) Dealer that sold the certificate(s) to the Bank: Deutsche.

(b) Description of the trust: Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2005-65CB was a securitization in November 2005 of 4,983 mortgage loans, in two groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2005-65CB Pros. Sup. S-4, S-15, and S-36.

(c) Description of the certificate(s) that the Bank purchased: Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 1-A-1, for which the Bank paid \$157,261,000 plus accrued interest on November 30, 2005.

(d) Ratings of the certificate(s) when the Bank purchased them: Standard & Poor's – AAA; Moody's – Aaa.

(e) Current ratings of the certificate(s): Standard & Poor's – CCC; Moody's – Caal.

(f) URL of prospectus supplement for this securitization:
<http://www.sec.gov/Archives/edgar/data/1269518/000095012905011497/v14709e424b5.txt>

(g) Registration statement pursuant or traceable to which the certificate(s) were issued: Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT with the SEC on form S-3 on July 25, 2005. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the LTVs of the mortgage loans in the collateral pool of this securitization.

1 (a) "No mortgage loan in any loan group had a Loan-to-Value Ratio at origination of
2 more than 100.00%." CWALT 2005-65CB Pros. Sup. S-16.

3 (b) In the section of the prospectus supplement entitled "The Mortgage Pool,"
4 Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral
5 pool. CWALT 2005-65CB Pros. Sup. S-18 to S-34. Each table focused on a certain characteristic
6 of the loans (for example, current principal balance) and divided the loans into categories based
7 on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000,
8 \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data
9 about the loans in each category. Among these data was the "Weighted Average Original Loan-
10 to-Value Ratio." There were 10 such tables in "The Mortgage Pool" section for the loans in loan
11 group 1. In each table, the number of categories into which the loans were divided ranged from
12 three to 32. Thus, in "The Mortgage Pool" section, Deutsche and CWALT made hundreds of
13 statements about the original LTVs of the loans in loan group 1. CWALT 2005-65CB Pros. Sup.
14 S-18 to S-25.

15 (c) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
16 mortgage loans in loan group 1 is approximately 70.13%." CWALT 2005-65CB Pros. Sup. S-21.

17 (d) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
18 of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT
19 similarly made hundreds of statements about the original LTVs of the loans in loan group 2.
20 CWALT 2005-65CB Pros. Sup. S-26 to S-34.

21 (e) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
22 mortgage loans in loan group 2 is approximately 70.57%." CWALT 2005-65CB Pros. Sup. S-30.

Item 62. Details of the results of the AVM analysis:

Number of loans	4,983
Number of properties on which there was enough information for the model to determine a true market value	2,712
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,420
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$76,206,784
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	484
Aggregate amount by which the true market values of those properties exceed their stated values	\$28,153,244
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	171
Weighted-average LTV, as stated by Defendants (group 1)	70.1%
Weighted-average LTV, as determined by the model (group 1)	76.3%

Item 65. Evidence from subsequent sales of refinanced properties:

Of the 4,983 mortgage loans in the collateral pool, 3,136 were taken out to refinance, rather than to purchase, properties. For those 3,136 loans, the value (denominator) in the LTV was an appraised value rather than a sale price. Of those 3,136 properties, 303 were subsequently sold for a total of approximately \$81,863,736. The total value ascribed to those same properties in the LTV data reported in the prospectus supplement and other documents sent to the Bank was \$93,045,524. Thus, those properties were sold for 88% of the value ascribed to them, a difference of 12%. This difference cannot be accounted for by declines in house prices in the areas in which those properties were located.

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 313
- (b) Total reduction in equity from additional liens: \$16,799,792
- (c) Weighted-average reduction in equity from additional liens: 60.5%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans originated by Countrywide: "All

1 appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in
2 effect." CWALT 2005-65CB Pros. Sup. S-38.

3 **Item 88. Untrue or misleading statements about owner-occupancy of the properties**
4 **that secured the mortgage loans:**

5 In the prospectus supplement, Deutsche and CWALT made the following statements
6 about the occupancy status of the properties that secured the mortgage loans in the collateral pool
7 of this securitization.

8 (a) In "The Mortgage Pool" section of the prospectus supplement, described in Item
9 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the
10 mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property,"
11 and "Secondary Residence." The table made untrue and misleading statements about the number
12 of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate
13 principal balance outstanding in each of these categories. CWALT 2005-65CB Pros. Sup. S-24.

14 (b) In the "Occupancy Types" table, Deutsche and CWALT stated that 85.98% of the
15 mortgage loans in loan group 1 were secured by a "Primary Residence," 9.08% by an "Investment
16 Property," and 4.94% by a "Secondary Residence." CWALT 2005-65CB Pros. Sup. S-24.

17 (c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table
18 entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the
19 categories "Primary Residence," "Investment Property," and "Secondary Residence." The table
20 made untrue and misleading statements about the number of mortgage loans, the aggregate
21 principal balance outstanding, and the percent of aggregate principal balance outstanding in each
22 of these categories. CWALT 2005-65CB Pros. Sup. S-33.

23 (d) In the "Occupancy Types" table, Deutsche and CWALT stated that 83.91% of the
24 mortgage loans in loan group 2 were secured by a "Primary Residence," 10.46% by an
25 "Investment Property," and 5.63% by a "Secondary Residence." CWALT 2005-65CB Pros. Sup.
26 S-33.

Item 96. Details of properties that were stated to be owner-occupied, but were not:

- (a) Number of loans on which the owner of the property instructed tax authorities to send property tax bills to him or her at a different address: 326**
- (b) Number of loans on which the owner of the property could have, but did not, designate the property as his or her homestead: 472**
- (c) Number of loans on which the owner of the property owned three or more properties: 33**
- (d) Eliminating duplicates, number of loans about which one or more of statements (a) through (c) is true: 741**

Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

On pages S-36 through S-41 of the prospectus supplement, Deutsche and CWALT made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

(a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower." CWALT 2005-65CB Pros. Sup. S-37.

(b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment ability and the value and adequacy of the mortgaged property as collateral." CWALT 2005-65CB Pros. Sup. S-37.

Item 108. 30+ days delinquencies in this securitization:

- (a) Number of the mortgage loans that were 30+ days delinquent on March 31, 2010: 708**
- (b) Percent of the mortgage loans that were 30+ days delinquent on March 31, 2010: 14.2%**
- (c) Percent of all mortgage loans in the United States that were 30+ days delinquent on March 31, 2010: 14.7%**

Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:

On page S-3 of the prospectus supplement, Deutsche and CWALT made statements about the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by Standard & Poor's Rating Services.

Deutsche and CWALT also stated that: "The classes of certificates listed below will not be offered unless they are assigned the following ratings by Standard & Poor's . . . Moody's Investors Service, Inc. ('Moody's') and Dominion Bond Rating Service ("DBRS")." The requirements for class 1-A-1, from which this certificate was to be paid, was for AAA from Standard & Poor's and Aaa from Moody's. CWALT 2005-65CB Pros. Sup. S-3.

Deutsche and CWALT also stated that: "It is a condition to the issuance of the senior certificates that they be rated 'AAA' each by Standard & Poor's . . . and Dominion Bond Rating Service ("DBRS") and 'Aaa' by Moody's Investors Service, Inc. ('Moody's')." CWALT 2005-65CB Pros. Sup. S-98.

Item 120. Summary of loans about which the Defendants made untrue or misleading statements:

- (a) Number of loans whose LTVs were materially understated: 1,420
- (b) Number of loans in which the owner's equity was reduced by 5% or more by undisclosed additional liens: 313
- (c) Number of loans in which the properties were stated to be owner-occupied but were not: 741
- (d) Eliminating duplicates, number of loans about which the Defendants made untrue or misleading statements: 2,078
- (e) Eliminating duplicates, percent of loans about which the Defendants made untrue or misleading statements: 41.7%

SCHEDULE 26 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2005-52CB was a securitization in September 2005 of 2,223 mortgage loans,² in one pool. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2005-52CB Pros. Sup. S-4, S-16, and S-28.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 1-A-1, for which the Bank paid \$206,662,670 plus accrued interest on September 30, 2005.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Standard & Poor's – AAA; Moody's – Aaa; Fitch – AAA.

(e) **Current ratings of the certificate(s):** Standard & Poor's – A+; Moody's – Caa1; Fitch – B.

(f) **URL of prospectus supplement for this securitization:**
<http://www.sec.gov/Archives/edgar/data/1269518/000095013605006200/file001.htm>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT with the SEC on form S-3 on July 25, 2005. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

² CWALT 2006-52CB was a prefunded securitization. On the closing date of the securitization there were 2,223 mortgage loans in the trust. After the closing date of the securitization, the trust purchased an additional 614 mortgage loans.

1 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

2 In the prospectus supplement, Deutsche and CWALT made the following statements
3 about the LTVs of the mortgage loans in the collateral pool of this securitization.

4 (a) "No Initial Mortgage Loan had a Loan-to-Value Ratio at origination of more than
5 100.00%." CWALT 2005-52CB Pros. Sup. S-17.

6 (b) In the section of the prospectus supplement entitled "The Mortgage Pool,"
7 Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral
8 pool. Each table focused on a certain characteristic of the loans (for example, current principal
9 balance) and divided the loans into categories based on that characteristic (for example, loans
10 with current principal balances of \$0.01 to \$50,000, \$50,000.01 to \$100,000, \$100,000.01 to
11 \$150,000, etc.). Each table then presented various data about the loans in each category. Among
12 these data was the "Weighted Average Original Loan-to-Value Ratio." There were 10 such tables
13 in "The Mortgage Pool" section for all of the loans in the collateral pool. In each table, the
14 number of categories into which the loans were divided ranged from three to 41. Thus, in "The
15 Mortgage Pool" section, Deutsche and CWALT made hundreds of statements about the original
16 LTVs of the loans in the collateral pool. CWALT 2005-52CB Pros. Sup. S-19 to S-25.

17 (c) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
18 of the Initial Mortgage Loans is approximately 71.22%." CWALT 2005-52CB Pros. Sup. S-22.

Item 62. Details of the results of the AVM analysis:

Number of loans	2,837
Number of properties on which there was enough information for the model to determine a true market value	1,511
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	799
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$40,596,817
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	282
Aggregate amount by which the true market values of those properties exceed their stated values	\$13,033,564
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	95
Weighted-average LTV, as stated by Defendants	71.2%
Weighted-average LTV, as determined by the model	76.8%

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 136
- (b) Total reduction in equity from additional liens: \$6,531,135
- (c) Weighted-average reduction in equity from additional liens: 58.3%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans in this securitization: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2005-52CB Pros. Sup. S-30.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

- (a) In "The Mortgage Pool" section of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided all of the mortgage loans in the collateral pool into the categories "Primary Residence," "Investment

Property,” and “Secondary Residence.” The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-52CB Pros. Sup. S-25.

(b) In the “Occupancy Types” table, Deutsche and CWALT stated that 86.88% of the mortgage loans in the collateral pool were secured by a “Primary Residence,” 9.17% by an “Investment Property,” and 3.94% by a “Secondary Residence.” CWALT 2005-52CB Pros. Sup. S-25.

Item 96. Details of properties that were stated to be owner-occupied, but were not:

- (a) Number of loans on which the owner of the property instructed tax authorities to send property tax bills to him or her at a different address: 197
- (b) Number of loans on which the owner of the property could have, but did not, designate the property as his or her homestead: 260
- (c) Number of loans on which the owner of the property owned three or more properties: 12
- (d) Eliminating duplicates, number of loans about which one or more of statements (a) through (c) is true: 402

Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

On pages S-28 through S-33 of the prospectus supplement, Deutsche and CWALT made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

(a) “Exceptions to Countrywide Home Loans’ underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower.” CWALT 2005-52CB Pros. Sup. S-29.

(b) “Countrywide Home Loans’ underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower’s credit standing and repayment

ability and the value and adequacy of the mortgaged property as collateral." CWALT 2005-31 Pros. Sup. S-57.

Item 106. Early payment defaults:

- (a) Number of the mortgage loans that suffered EPDs: 5
- (b) Percent of the mortgage loans that suffered EPDs: 0.2%
- (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that experienced EPDs: 0.18%

Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:

On page S-3 of the prospectus supplement, Deutsche and CWALT made statements about the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by Standard & Poor's Rating Services and Fitch.

Deutsche and CWALT also stated that: "The classes of certificates listed below will not be offered unless they are assigned the following ratings by Fitch Ratings ('Fitch'), Moody's Investors Service, Inc. ('Moody's') and Standard & Poor's Ratings Services" The requirement for certificate 1-A-1, from which this certificate was to be paid, was AAA for Standard & Poor's and Fitch, and Aaa for Moody's. CWALT 2005-52CB Pros. Sup. S-1.

Deutsche and CWALT also stated that: "It is a condition to the issuance of the offered certificates that they be rated the respective ratings set forth on page S-3 of the Summary of this prospectus supplement by Fitch Ratings ('Fitch'), Moody's Investors Service, Inc. ('Moody's') and Standard & Poor's Ratings Services" CWALT 2005-52CB Pros. Sup. S-87.

Item 120. Summary of loans about which the Defendants made untrue or misleading statements:

- (a) Number of loans whose LTVs were materially understated: 799
- (b) Number of loans in which the owner's equity was reduced by 5% or more by undisclosed additional liens: 136
- (c) Number of loans that suffered EPDs: 5

- 1 **(d) Number of loans in which the properties were stated to be owner-occupied**
2 **but were not: 402**
- 3 **(e) Eliminating duplicates, number of loans about which the Defendants made**
4 **untrue or misleading statements: 1,160**
- 5 **(f) Eliminating duplicates, percent of loans about which the Defendants made**
6 **untrue or misleading statements: 40.9%**

SCHEDULE 27 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) Dealer that sold the certificate(s) to the Bank: Deutsche.

(b) Description of the trust: Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2005-31 was a securitization in June 2005 of 2,651 mortgage loans, in two groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2005-31 Pros. Sup. S-5, S-18, and S-56.

(c) Description of the certificate(s) that the Bank purchased: Deutsche offered and sold to the Bank two senior certificates in this securitization, in tranche 1-A-2 and tranche 2-A-2, for which the Bank paid \$64,831,417 and \$87,493,465 plus accrued interest, respectively, on June 24, 2005.

(d) Ratings of the certificate(s) when the Bank purchased them:

Certificate: 1-A-2: Standard & Poor's – AAA; Moody's – Aaa.

Certificate 2-A-2: Standard & Poor's – AAA; Moody's – Aaa.

(e) Current ratings of the certificate(s):

Certificate: 1-A-2: Standard & Poor's – CCC; Moody's – B3.

Certificate 2-A-2: Standard & Poor's – B-; Moody's – B3.

(f) URL of prospectus supplement for this securitization:

<http://www.sec.gov/Archives/edgar/data/1269518/000095012905006808/v10086e424b5.txt>

(g) Registration statement pursuant or traceable to which the certificate(s) were issued: Certificates in this trust, including the certificates that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT with the SEC on form S-3 on April 21, 2005. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the LTVs of the mortgage loans in the collateral pool of this securitization.

(a) "No Mortgage Loan will have had a Loan-to-Value Ratio at origination of more than 95.00%." CWALT 2005-31 Pros. Sup. S-20.

(b) In the section of the prospectus supplement entitled "The Mortgage Pool," Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral pool. CWALT 2005-31 Pros. Sup. S-22 to S-54. Each table focused on a certain characteristic of the loans (for example, current principal balance) and divided the loans into categories based on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000, \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data about the loans in each category. Among these data was the "Weighted Average Original Loan-to-Value Ratio." There were 17 such tables in "The Mortgage Pool" section for the loans in loan group 1. In each table, the number of categories into which the loans were divided ranged from one to 91. Thus, in "The Mortgage Pool" section of the prospectus supplement, Deutsche and CWALT made hundreds of statements about the original LTVs of the loans in loan group 1. CWALT 2005-31 Pros. Sup. S-22 to S-39.

(c) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the group 1 mortgage loans was approximately 75.25%." CWALT 2005-31 Pros. Sup. S-27.

(d) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT similarly made hundreds of statements about the original LTVs of the loans in loan group 2. CWALT 2005-31 Pros. Sup. S-40 to S-54.

(e) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the group 2 mortgage loans was approximately 74.69%." CWALT 2005-31 Pros. Sup. S-44.

Item 62. Details of the results of the AVM analysis:

Number of loans	2,651
Number of properties on which there was enough information for the model to determine a true market value	1,808
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	893
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$78,825,371
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	308
Aggregate amount by which the true market values of those properties exceed their stated values	\$24,840,389
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	162
Weighted-average LTV, as stated by Defendants (group 1)	75.3%
Weighted-average LTV, as determined by the model (group 1)	84.7%
Weighted-average LTV, as stated by Defendants (group 2)	74.7%
Weighted-average LTV, as determined by the model (group 2)	83.2%

Item 65. Evidence from subsequent sales of refinanced properties:

Of the 2,651 mortgage loans in the collateral pool, 1,565 were taken out to refinance, rather than to purchase, properties. For those 1,565 loans, the value (denominator) in the LTV was an appraised value rather than a sale price. Of those 1,565 properties, 351 were subsequently sold for a total of approximately \$149,627,769. The total value ascribed to those same properties in the LTV data reported in the prospectus supplement and other documents sent to the Bank was \$174,952,700. Thus, those properties were sold for 85.5% of the value ascribed to them, a difference of 14.5%. This difference cannot be accounted for by declines in house prices in the areas in which those properties were located.

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 264
- (b) Total reduction in equity from additional liens: \$21,427,932
- (c) Weighted-average reduction in equity from additional liens: 52.2%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans in this securitization: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2005-31 Pros. Sup. S-58.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

(a) In "The Mortgage Pool" section of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-31 Pros. Sup. S-30.

(b) In the "Occupancy Types" table, Deutsche and CWALT stated that 79.77% of the mortgage loans in loan group 1 were secured by a "Primary Residence," 15.13% by an "Investment Property," and 5.1% by a "Secondary Residence." CWALT 2005-31 Pros. Sup. S-30.

(c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table entitled "Occupancy Types." In this table, Deutsche and CWALT divided the mortgage loans in loan group 2 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-31 Pros. Sup. S-46.

(d) In the "Occupancy Types" table, Deutsche and CWALT stated that 71.22% of the mortgage loans in loan group 2 were secured by a "Primary Residence," 21.09% by an

1 "Investment Property," and 7.69% by a "Secondary Residence." CWALT 2005-31 Pros. Sup. S-
2 46.

3 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

- 4 (a) Number of loans on which the owner of the property instructed tax
5 authorities to send property tax bills to him or her at a different address: 207
6 (b) Number of loans on which the owner of the property could have, but did not,
7 designate the property as his or her homestead: 342
8 (c) Number of loans on which the owner of the property owned three or more
9 properties: 32
10 (d) Eliminating duplicates, number of loans about which one or more of
11 statements (a) through (c) is true: 476

12 **Item 99. Untrue or misleading statements about the underwriting standards of the**
13 **originators of the mortgage loans:**

14 On pages S-56 through S-61 of the prospectus supplement, Deutsche and CWALT made
15 statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those
16 statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

17 (a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made
18 if compensating factors are demonstrated by a prospective borrower." CWALT 2005-31 Pros.
19 Sup. S-57.

20 (b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of
21 Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment
22 ability and the value and adequacy of the mortgaged property as collateral." CWALT 2005-31
23 Pros. Sup. S-57.

24 **Item 106. Early payment defaults:**

- 25 (a) Number of the mortgage loans that suffered EPDs: 12
26 (b) Percent of the mortgage loans that suffered EPDs: 0.5%
27
28

- 1 (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans
 2 made at the same time as the loans in the collateral pool that experienced
 3 EPDs: 0.18%

4 **Item 107. 90+ days delinquencies:**

- 5 (a) Number of the mortgage loans that suffered 90+ days delinquencies: 610
 6 (b) Percent of the mortgage loans that suffered 90+ days delinquencies: 23.0%
 7 (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans
 8 made at the same time as the loans in the collateral pool that suffered 90+
 9 days delinquencies: 16.5%

10 **Item 108. 30+ days delinquencies in this securitization:**

- 11 (a) Number of the mortgage loans that were 30+ days delinquent on March 31,
 12 2010: 594
 13 (b) Percent of the mortgage loans that were 30+ days delinquent on March 31,
 14 2010: 22.4%
 15 (c) Percent of all mortgage loans in the United States that were 30+ days
 16 delinquent on March 31, 2010: 14.7%

17 **Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:**

18 On page S-3 of the prospectus supplement, Deutsche and CWALT made statements about
 19 the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated
 20 that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by
 21 Standard & Poor's Rating Services.

22 Deutsche and CWALT also stated that: "The classes of certificates listed below will not
 23 be offered unless they receive the respective ratings at least as high as those set forth below from
 24 Standard & Poor's Ratings Services . . . and from Moody's Investors Service, Inc. ('Moody's')."
 25 The requirements for classes 1-A-2 and 2-A-2, from which these certificates were to be paid, was
 26 for AAA from Standard & Poor's and Aaa from Moody's. CWALT 2005-31 Pros. Sup. S-3.

27 Deutsche and CWALT also stated that: "It is a condition to the issuance of the offered
 28 certificates that they be rated the respective ratings set forth on page S-3 of the Summary of this

1 prospectus supplement by Standard & Poor's Ratings Services . . . and by Moody's Investors
2 Service, Inc. ('Moody's')." CWALT 2005-31 Pros. Sup. S-107.

3 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
4 **statements:**

5 (a) **Number of loans whose LTVs were materially understated: 893**

6 (b) **Number of loans in which the owner's equity was reduced by 5% or more by**
7 **undisclosed additional liens: 264**

8 (c) **Number of loans that suffered EPDs: 12**

9 (d) **Number of loans in which the properties were stated to be owner-occupied**
10 **but were not: 476**

11 (e) **Eliminating duplicates, number of loans about which the Defendants made**
12 **untrue or misleading statements: 1,299**

13 (f) **Eliminating duplicates, percent of loans about which the Defendants made**
14 **untrue or misleading statements: 49.0%**

SCHEDULE 28 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2005-20CB was a securitization in May 2005 of 5,807 mortgage loans,³ in four groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2005-20CB Pros. Sup. S-4, S-16, and S-55.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 1-A-1, for which the Bank paid \$201,187,500 plus accrued interest on May 31, 2005.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Standard & Poor's – AAA; Moody's – Aaa.

(e) **Current ratings of the certificate(s):** Standard & Poor's – B-; Moody's – Caa1.

(f) **URL of prospectus supplement for this securitization:**

<http://www.sec.gov/Archives/edgar/data/1269518/000095012905005802/v09354b5e424b5.txt>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT with the SEC on form S-3 on April 21, 2005. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

³ CWALT 2006-20CB was a prefunded securitization. On the closing date of the securitization there were 5,807 mortgage loans in the trust. After the closing date of the securitization, the trust purchased an additional 737 mortgage loans.

1 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

2 In the prospectus supplement, Deutsche and CWALT made the following statements
3 about the LTVs of the mortgage loans in the collateral pool of this securitization.

4 (a) "No Initial Mortgage Loan in any loan group had a Loan-to-Value Ratio at
5 origination of more than 100.00%." CWALT 2005-20CB Pros. Sup. S-18.

6 (b) In the section of the prospectus supplement entitled "The Mortgage Pool,"
7 Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral
8 pool. CWALT 2005-20CB Pros. Sup. S-20 to S-51. Each table focused on a certain characteristic
9 of the loans (for example, current principal balance) and divided the loans into categories based
10 on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000,
11 \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data
12 about the loans in each category. Among these data was the "Weighted Average Original Loan-
13 to-Value Ratio." There were 10 such tables in "The Mortgage Pool" section of the prospectus
14 supplement for the loans in loan group 1. In each table, the number of categories into which the
15 loans were divided ranged from three to 24. Thus, in "The Mortgage Pool" section of the
16 prospectus supplement, Deutsche and CWALT made hundreds of statements about the original
17 LTVs of the loans in loan group 1. CWALT 2005-20CB Pros. Sup. S-20 to S-27.

18 (c) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
19 of the Initial Mortgage Loans in loan group 1 is approximately 74.46%." CWALT 2005-20CB
20 Pros. Sup. S-23.

21 (d) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
22 of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT
23 similarly made hundreds of statements about the original LTVs of the loans in loan group 2.
24 CWALT 2005-20CB Pros. Sup. S-28 to S-36.

25 (e) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
26 of the Initial Mortgage Loans in loan group 2 is approximately 74.17%." CWALT 2005-20CB
27 Pros. Sup. S-32.

28

1 (f) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
2 of statistics about the mortgage loans in loan group 3. In these tables, Deutsche and CWALT
3 similarly made hundreds of statements about the original LTVs of the loans in loan group 3.
4 CWALT 2005-20CB Pros. Sup. S-37 to S-45.

5 (g) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
6 Mortgage Loans in loan group 3 is approximately 73.40%." CWALT 2005-20CB Pros. Sup. S-
7 41.

8 (h) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
9 of statistics about the mortgage loans in loan group 4. In these tables, Deutsche and CWALT
10 similarly made hundreds of statements about the original LTVs of the loans in loan group 4.
11 CWALT 2005-20CB Pros. Sup. S-46 to S-51.

12 (i) "As of the cut-off date, the weighted average original Loan-to-Value Ratio of the
13 Mortgage Loans in loan group 4 is approximately 64.69%." CWALT 2005-20CB Pros. Sup. S-
14 48.

Item 62. Details of the results of the AVM analysis:

Number of loans	6,544
Number of properties on which there was enough information for the model to determine a true market value	3,125
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,431
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$72,754,958
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	700
Aggregate amount by which the true market values of those properties exceed their stated values	\$34,281,562
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	235
Weighted-average LTV, as stated by Defendants (group 1)	74.5%
Weighted-average LTV, as determined by the model (group 1)	80.7%

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 362
- (b) Total reduction in equity from additional liens: \$18,532,454
- (c) Weighted-average reduction in equity from additional liens: 67.6%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans originated or acquired by Countrywide: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2005-20CB Pros. Sup. S-56.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

- (a) In "The Mortgage Pool" section of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property,"

1 and "Secondary Residence." The table made untrue and misleading statements about the number
2 of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate
3 principal balance outstanding in each of these categories. CWALT 2005-20CB Pros. Sup. S-26.

4 (b) In the "Occupancy Types" table, Deutsche and CWALT stated that 88.74% of the
5 mortgage loans in loan group 1 were secured by a "Primary Residence," 8.48% by an "Investment
6 Property," and 2.78% by a "Secondary Residence." CWALT 2005-20CB Pros. Sup. S-26.

7 (c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table
8 entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the
9 categories "Primary Residence," "Investment Property," and "Secondary Residence." The table
10 made untrue and misleading statements about the number of mortgage loans, the aggregate
11 principal balance outstanding, and the percent of aggregate principal balance outstanding in each
12 of these categories. CWALT 2005-20CB Pros. Sup. S-35.

13 (d) In the "Occupancy Types" table, Deutsche and CWALT stated that 85.53% of the
14 mortgage loans in loan group 2 were secured by a "Primary Residence," 10.97% by an
15 "Investment Property," and 3.5% by a "Secondary Residence." CWALT 2005-20CB Pros. Sup.
16 S-35.

17 (e) In "The Mortgage Pool" section, Deutsche and CWALT presented another table
18 entitled "Occupancy Types." This table divided the mortgage loans in loan group 3 into the
19 categories "Primary Residence," "Investment Property," and "Secondary Residence." The table
20 made untrue and misleading statements about the number of mortgage loans, the aggregate
21 principal balance outstanding, and the percent of aggregate principal balance outstanding in each
22 of these categories. CWALT 2005-20CB Pros. Sup. S-44.

23 (f) In the "Occupancy Types" table, Deutsche and CWALT stated that 88.52% of the
24 mortgage loans in loan group 3 were secured by a "Primary Residence," 9.23% by an "Investment
25 Property," and 2.24% by a "Secondary Residence." CWALT 2005-20CB Pros. Sup. S-44.

26 (g) In "The Mortgage Pool" section, Deutsche and CWALT presented another table
27 entitled "Occupancy Types." This table divided the mortgage loans in loan group 4 into the
28 categories "Primary Residence," "Investment Property," and "Secondary Residence." The table

made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-20CB Pros. Sup. S-51.

(h) In the "Occupancy Types" table, Deutsche and CWALT stated that 78.39% of the mortgage loans in loan group 4 were secured by a "Primary Residence," 16.99% by an "Investment Property," and 4.62% by a "Secondary Residence." CWALT 2005-20CB Pros. Sup. S-51.

Item 96. Details of properties that were stated to be owner-occupied, but were not:

- (a) Number of loans on which the owner of the property instructed tax authorities to send property tax bills to him or her at a different address: 461
- (b) Number of loans on which the owner of the property could have, but did not, designate the property as his or her homestead: 652
- (c) Number of loans on which the owner of the property owned three or more properties: 38
- (d) Eliminating duplicates, number of loans about which one or more of statements (a) through (c) is true: 1,008

Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

On pages S-55 through S-60 of the prospectus supplement, Deutsche and CWALT made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

(a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower." CWALT 2005-20CB Pros. Sup. S-56.

(b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment ability and the value and adequacy of the mortgaged property as collateral." CWALT 2005-20CB Pros. Sup. S-56.

Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:

On page S-3 of the prospectus supplement, Deutsche and CWALT made statements about the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by Standard & Poor's Rating Services.

Deutsche and CWALT also stated that: "The classes of certificates listed below will not be offered unless they are assigned the following ratings by Standard & Poor's, . . . and by Moody's Investors Service, Inc. ('Moody's')." The requirement for class 1-A-1, from which this certificate was to be paid, was AAA for Standard & Poor's and Aaa for Moody's. CWALT 2005-20CB Pros. Sup. S-3.

Deutsche and CWALT also stated that: "It is a condition to the issuance of the offered certificates that they be rated the respective ratings set forth on page S-3 of the Summary of this prospectus supplement by Standard & Poor's Ratings Services, . . . and by Moody's Investors Service, Inc. ('Moody's')." CWALT 2005-20CB Pros. Sup. S-119.

Item 120. Summary of loans about which the Defendants made untrue or misleading statements:

- (a) Number of loans whose LTVs were materially understated: 1,431
- (b) Number of loans in which the owner's equity was reduced by 5% or more by undisclosed additional liens: 362
- (c) Number of loans in which the properties were stated to be owner-occupied but were not: 1,008
- (d) Eliminating duplicates, number of loans about which the Defendants made untrue or misleading statements: 2,384
- (e) Eliminating duplicates, percent of loans about which the Defendants made untrue or misleading statements: 36.4%

SCHEDULE 29 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) Dealer that sold the certificate(s) to the Bank: Deutsche.

(b) Description of the trust: Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2005-11CB was a securitization in April 2005 of 6,367 mortgage loans,⁴ in three groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2005-11CB Pros. Sup. S-4, S-15, and S-46.

(c) Description of the certificate(s) that the Bank purchased: Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 2-A-1, for which the Bank paid \$100,468,750 plus accrued interest on April 29, 2005.

(d) Ratings of the certificate(s) when the Bank purchased them: Standard & Poor's – AAA; Moody's – Aaa.

(e) Current ratings of the certificate(s): Standard & Poor's – BBB-; Moody's – Baa3.

(f) URL of prospectus supplement for this securitization:
<http://www.sec.gov/Archives/edgar/data/1269518/000095014805000054/v08051b5e424b5.txt>

(g) Registration statement pursuant or traceable to which the certificate(s) were issued: Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT with the SEC on form S-3 on April 21, 2005. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

⁴ CWALT 2005-11CB was a prefunded securitization. On the closing date of the securitization there were 6,367 mortgage loans in the trust. After the closing date of the securitization, the trust purchased an additional 83 mortgage loans.

1 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

2 In the prospectus supplement, Deutsche and CWALT made the following statements
3 about the LTVs of the mortgage loans in the collateral pool of this securitization.

4 (a) "No Initial Mortgage Loan in any loan group had a Loan-to-Value Ratio at
5 origination of more than 100.00%." CWALT 2005-11CB Pros. Sup. S-16.

6 (b) In the section of the prospectus supplement entitled "The Mortgage Pool,"
7 Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral
8 pool. CWALT 2005-11CB Pros. Sup. S-18 to S-42. Each table focused on a certain characteristic
9 of the loans (for example, current principal balance) and divided the loans into categories based
10 on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000,
11 \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data
12 about the loans in each category. Among these data was the "Weighted Average Original Loan-
13 to-Value Ratio." There were 10 such tables in "The Mortgage Pool" section for the loans in loan
14 group 1. In each table, the number of categories into which the loans were divided ranged from
15 three to 44. Thus, in "The Mortgage Pool" section, Deutsche and CWALT made hundreds of
16 statements about the original LTVs of the loans in loan group 1. CWALT 2005-11CB Pros. Sup.
17 S-18 to S-26.

18 (c) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
19 of the Initial Mortgage Loans in loan group 1 is approximately 78.31%." CWALT 2005-11CB
20 Pros. Sup. S-22.

21 (d) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
22 of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT
23 similarly made hundreds of statements about the original LTVs of the loans in loan group 2.
24 CWALT 2005-11CB Pros. Sup. S-27 to S-34.

25 (e) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
26 of the Initial Mortgage Loans in loan group 2 is approximately 69.06%." CWALT 2005-11CB
27 Pros. Sup. S-31.

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(f) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables of statistics about the mortgage loans in loan group 3. In these tables, Deutsche and CWALT similarly made hundreds of statements about the original LTVs of the loans in loan group 3. CWALT 2005-11CB Pros. Sup. S-35 to S-42.

(g) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio of the Initial Mortgage Loans in loan group 3 is approximately 71.42%." CWALT 2005-11CB Pros. Sup. S-38.

Item 62. Details of the results of the AVM analysis:

Number of loans	6,450
Number of properties on which there was enough information for the model to determine a true market value	3,193
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,415
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$62,071,882
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	789
Aggregate amount by which the true market values of those properties exceed their stated values	\$44,968,991
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	197
Weighted-average LTV, as stated by Defendants (group 2)	69.1%
Weighted-average LTV, as determined by the model (group 2)	73.7%

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 442
- (b) Total reduction in equity from additional liens: \$23,508,078
- (c) Weighted-average reduction in equity from additional liens: 64.3%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans in this securitization: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2005-11CB Pros. Sup. S-47.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

(a) In "The Mortgage Pool" section of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-11CB Pros. Sup. S-25.

(b) In the "Occupancy Types" table, Deutsche and CWALT stated that 64.36% of the mortgage loans in loan group 1 were secured by a "Primary Residence," 33.54% by an "Investment Property," and 2.11% by a "Secondary Residence." CWALT 2005-11CB Pros. Sup. S-25.

(c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-11CB Pros. Sup. S-34.

(d) In the "Occupancy Types" table, Deutsche and CWALT stated that 92.71% of the mortgage loans in loan group 2 were secured by a "Primary Residence," 5.68% by an "Investment Property," and 1.61% by a "Secondary Residence." CWALT 2005-11CB Pros. Sup. S-34.

(e) In "The Mortgage Pool" section, Deutsche and CWALT presented another table entitled "Occupancy Types." This table divided the mortgage loans in loan group 3 into the categories "Primary Residence," "Investment Property," and "Secondary Residence." The table made untrue and misleading statements about the number of mortgage loans, the aggregate

principal balance outstanding, and the percent of aggregate principal balance outstanding in each of these categories. CWALT 2005-11CB Pros. Sup. S-41.

(f) In the "Occupancy Types" table, Deutsche and CWALT stated that 88.63% of the mortgage loans in loan group 3 were secured by a "Primary Residence," 8.63% by an "Investment Property," and 2.74% by a "Secondary Residence." CWALT 2005-11CB Pros. Sup. S-41.

Item 96. Details of properties that were stated to be owner-occupied, but were not:

(a) Number of loans on which the owner of the property instructed tax authorities to send property tax bills to him or her at a different address: 420

(b) Number of loans on which the owner of the property could have, but did not, designate the property as his or her homestead: 608

(c) Number of loans on which the owner of the property owned three or more properties: 36

(d) Eliminating duplicates, number of loans about which one or more of statements (a) through (c) is true: 930

Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

On pages S-46 through S-51 of the prospectus supplement, Deutsche and CWALT made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

(a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower." CWALT 2005-11CB Pros. Sup. S-47.

(b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment ability and the value and adequacy of the mortgaged property as collateral." CWALT 2005-11CB Pros. Sup. S-47.

Item 106. Early payment defaults:

(a) Number of the mortgage loans that suffered EPDs: 15

1 (b) Percent of the mortgage loans that suffered EPDs: 0.2%

2 (c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans
3 made at the same time as the loans in the collateral pool that experienced
4 EPDs: 0.18%

5 **Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:**

6 On page S-3 of the prospectus supplement, Deutsche and CWALT made statements about
7 the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated
8 that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by
9 Standard & Poor's Rating Services.

10 Deutsche and CWALT also stated that: "The classes of certificates listed below will not
11 be offered unless they are assigned the following ratings by Standard & Poor's, . . . and by
12 Moody's Investors Service, Inc. ('Moody's')." The requirements for class 2-A-1, from which this
13 certificate was to be paid, was for AAA from Standard & Poor's and Aaa from Moody's.

14 CWALT 2005-11CB Pros. Sup. S-3.

15 Deutsche and CWALT also stated that: "It is a condition to the issuance of the senior
16 certificates that they be rated AAA by Standard & Poor's, a division of The McGraw-Hill
17 Companies, Inc. ('S&P') and Aaa by Moody's Investors Service, Inc. ('Moody's')." CWALT
18 2005-11CB Pros. Sup. S-106.

19 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
20 **statements:**

21 (a) Number of loans whose LTVs were materially understated: 1,415

22 (b) Number of loans in which the owner's equity was reduced by 5% or more by
23 undisclosed additional liens: 442

24 (c) Number of loans that suffered EPDs: 15

25 (d) Number of loans in which the properties were stated to be owner-occupied
26 but were not: 930

27 (e) Eliminating duplicates, number of loans about which the Defendants made
28 untrue or misleading statements: 2,396

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(f) **Eliminating duplicates, percent of loans about which the Defendants made untrue or misleading statements: 37.2%**

SCHEDULE 30 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsche, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2005-7CB was a securitization in February 2005 of 5,231 mortgage loans,⁵ in two groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2005-7CB Pros. Sup. S-4, S-14, and S-40.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank a senior certificate in this securitization, in tranche 1-A-1, for which the Bank paid \$201,601,563 plus accrued interest on February 28, 2005.

(d) **Ratings of the certificate(s) when the Bank purchased them:** Standard & Poor's – AAA; Moody's – Aaa.

(e) **Current ratings of the certificate(s):** Standard & Poor's – AA; Moody's – Baa1.

(f) **URL of prospectus supplement for this securitization:**

<http://www.sec.gov/Archives/edgar/data/1269518/000095012905001766/v05923b5e424b5.txt>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificate that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT with the SEC on form S-3 on September 23, 2004. Annexed to the registration statement was a prospectus. The prospectus was amended from time to time by prospectus supplements whenever a new series of certificates was issued pursuant or traceable to that registration statement.

⁵ CWALT 2005-7CB was a prefunded securitization. On the closing date of the securitization there were 5,231 mortgage loans in the trust. After the closing date of the securitization, the trust purchased an additional 291 mortgage loans.

1 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

2 In the prospectus supplement, Deutsche and CWALT made the following statements
3 about the LTVs of the mortgage loans in the collateral pool of this securitization.

4 (a) "No Initial Mortgage Loan had a Loan-to-Value Ratio at origination of more than
5 100.00%." CWALT 2005-7CB Pros. Sup. S-16.

6 (b) In the section of the prospectus supplement entitled "The Mortgage Pool,"
7 Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral
8 pool. CWALT 2005-7CB Pros. Sup. S-18 to S-36. Each table focused on a certain characteristic
9 of the loans (for example, current principal balance) and divided the loans into categories based
10 on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000,
11 \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data
12 about the loans in each category. Among these data was the "Weighted Average Original Loan-
13 to-Value Ratio." There were 10 such tables in "The Mortgage Pool" section for the loans in loan
14 group 1. In each table, the number of categories into which the loans were divided ranged from
15 three to 55. Thus, in "The Mortgage Pool" section, Deutsche and CWALT made hundreds of
16 statements about the original LTVs of the loans in loan group 1. CWALT 2005-7CB Pros. Sup.
17 S-18 to S-26.

18 (c) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
19 of the Initial Mortgage Loans in loan group 1 is approximately 71.72%." CWALT 2005-7CB
20 Pros. Sup. S-22.

21 (d) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
22 of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT
23 similarly made hundreds of statements about the original LTVs of the loans in loan group 2.
24 CWALT 2005-7CB Pros. Sup. S-27 to S-36.

25 (e) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
26 of the Initial Mortgage Loans in loan group 2 is approximately 71.43%." CWALT 2005-7CB
27 Pros. Sup. S-32.

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Item 62. Details of the results of the AVM analysis:

Number of loans	5,231
Number of properties on which there was enough information for the model to determine a true market value	2,639
Number of loans on which the stated value was 105% or more of the true market value as reported by the model	1,244
Aggregate amount by which the stated values of those properties exceeded their true market values as reported by the model	\$54,468,032
Number of loans on which the stated value was 95% or less of the true market value as reported by the model	572
Aggregate amount by which the true market values of those properties exceed their stated values	\$31,297,556
Number of loans with LTVs over 100%, as stated by Defendants	0
Number of loans with LTVs over 100%, as determined by the model	171
Weighted-average LTV, as stated by Defendants (group 1)	71.7%
Weighted-average LTV, as determined by the model (group 1)	76.6%

Item 71. Undisclosed additional liens:

- (a) Minimum number of properties with additional liens: 360
- (b) Total reduction in equity from additional liens: \$19,890,103
- (c) Weighted-average reduction in equity from additional liens: 63.7%

Item 82. Untrue or misleading statements about compliance with USPAP:

In the prospectus supplement, Deutsche and CWALT made the following statement about the appraisals of the properties that secured the mortgage loans in this securitization: "All appraisals are required to conform to Fannie Mae or Freddie Mac appraisal standards then in effect." CWALT 2005-7CB Pros. Sup. S-41.

Item 88. Untrue or misleading statements about owner-occupancy of the properties that secured the mortgage loans:

In the prospectus supplement, Deutsche and CWALT made the following statements about the occupancy status of the properties that secured the mortgage loans in the collateral pool of this securitization.

- (a) In "The Mortgage Pool" section of the prospectus supplement, described in Item 52, Deutsche and CWALT presented a table entitled "Occupancy Types." This table divided the mortgage loans in loan group 1 into the categories "Primary Residence," "Investment Property,"

1 and "Secondary Residence." The table made untrue and misleading statements about the number
 2 of mortgage loans, the aggregate principal balance outstanding, and the percent of aggregate
 3 principal balance outstanding in each of these categories. CWALT 2005-7CB Pros. Sup. S-25.

4 (b) In the "Occupancy Types" table, Deutsche and CWALT stated that 88.83% of the
 5 mortgage loans in loan group 1 were secured by a "Primary Residence," 9.44% by an "Investment
 6 Property," and 1.73% by a "Secondary Residence." CWALT 2005-7CB Pros. Sup. S-25.

7 (c) In "The Mortgage Pool" section, Deutsche and CWALT presented another table
 8 entitled "Occupancy Types." This table divided the mortgage loans in loan group 2 into the
 9 categories "Primary Residence," "Investment Property," and "Secondary Residence." The table
 10 made untrue and misleading statements about the number of mortgage loans, the aggregate
 11 principal balance outstanding, and the percent of aggregate principal balance outstanding in each
 12 of these categories. CWALT 2005-7CB Pros. Sup. S-35.

13 (d) In the "Occupancy Types" table, Deutsche and CWALT stated that 88.57% of the
 14 mortgage loans in loan group 2 were secured by a "Primary Residence," 9.03% by an "Investment
 15 Property," and 2.4% by a "Secondary Residence." CWALT 2005-7CB Pros. Sup. S-35.

16 **Item 96. Details of properties that were stated to be owner-occupied, but were not:**

- 17 (a) **Number of loans on which the owner of the property instructed tax**
 18 **authorities to send property tax bills to him or her at a different address: 360**
 19 (b) **Number of loans on which the owner of the property could have, but did not,**
 20 **designate the property as his or her homestead: 525**
 21 (c) **Number of loans on which the owner of the property owned three or more**
 22 **properties: 28**
 23 (d) **Number of loans that went straight from current to foreclosure or ownership**
 24 **by lender: 1**
 25 (e) **Eliminating duplicates, number of loans about which one or more of**
 26 **statements (a) through (d) is true: 812**
 27
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Item 99. Untrue or misleading statements about the underwriting standards of the originators of the mortgage loans:

On pages S-40 through S-45 of the prospectus supplement, Deutsche and CWALT made statements about the underwriting guidelines of Countrywide Home Loans, Inc. All of those statements are incorporated herein by reference. In particular, Deutsche and CWALT stated that:

(a) "Exceptions to Countrywide Home Loans' underwriting guidelines may be made if compensating factors are demonstrated by a prospective borrower." CWALT 2005-7CB Pros. Sup. S-41.

(b) "Countrywide Home Loans' underwriting standards are applied by or on behalf of Countrywide Home Loans to evaluate the prospective borrower's credit standing and repayment ability and the value and adequacy of the mortgaged property as collateral." CWALT 2005-7CB Pros. Sup. S-41.

Item 106. Early payment defaults:

(a) Number of the mortgage loans that suffered EPDs: 15

(b) Percent of the mortgage loans that suffered EPDs: 0.3%

(c) Percent of all securitized, non-agency prime (including Alt-A) mortgage loans made at the same time as the loans in the collateral pool that experienced EPDs: 0.18%

Item 117. Statements about the ratings of the certificate(s) that the Bank purchased:

On page S-3 of the prospectus supplement, Deutsche and CWALT made statements about the ratings assigned to the certificates issued in this securitization. Deutsche and CWALT stated that the Bank's certificate was rated Aaa by Moody's Investors Service, Inc. and AAA by Standard & Poor's Rating Services.

Deutsche and CWALT also stated that: "The classes of certificates listed below will not be offered unless they are assigned the following ratings by Standard & Poor's, . . . and by Moody's Investors Service, Inc. ('Moody's')." The requirements for class 1-A-1, from which this certificate was to be paid, was for AAA from Standard & Poor's and Aaa from Moody's. CWALT 2005-7CB Pros. Sup. S-3.

1 Deutsche and CWALT also stated that: "It is a condition to the issuance of the senior
2 certificates that they be rated AAA by Standard & Poor's, a division of The McGraw-Hill
3 Companies, Inc. ("S&P") and Aaa by Moody's Investors Service, Inc. ('Moody's')." CWALT
4 2005-7CB Pros. Sup. S-95.

5 **Item 120. Summary of loans about which the Defendants made untrue or misleading**
6 **statements:**

- 7 (a) Number of loans whose LTVs were materially understated: 1,244
8 (b) Number of loans in which the owner's equity was reduced by 5% or more by
9 undisclosed additional liens: 360
10 (c) Number of loans that suffered EPDs: 15
11 (d) Number of loans in which the properties were stated to be owner-occupied
12 but were not: 812
13 (e) Eliminating duplicates, number of loans about which the Defendants made
14 untrue or misleading statements: 2,057
15 (f) Eliminating duplicates, percent of loans about which the Defendants made
16 untrue or misleading statements: 37.3%

SCHEDULE 31 TO THE AMENDED COMPLAINT

To the extent that this Schedule is incorporated by reference into allegations in the complaint, those allegations are made against Defendants Deutsch, CWALT, and Countrywide Financial Corporation.

Item 44. Details of trust and certificate(s).

(a) **Dealer that sold the certificate(s) to the Bank:** Deutsche.

(b) **Description of the trust:** Alternative Loan Trust, Mortgage Pass-Through Certificates, Series 2005-1CB was a securitization in January 2005 of 5,782 mortgage loans,⁶ in four groups. The mortgage loans in this securitization were originated or acquired by Countrywide Home Loans, Inc. CWALT 2005-1CB Pros. Sup. S-4, S-17, and S-50.

(c) **Description of the certificate(s) that the Bank purchased:** Deutsche offered and sold to the Bank two senior certificates in this securitization, in tranche 1-A-1 and 1-A-2, for which the Bank paid \$158,368,750 and \$128,679,342, plus accrued interest, respectively, on August 5, 2005 and January 31, 2005.

(d) **Ratings of the certificate(s) when the Bank purchased them:**

Certificate: 1-A-1: Standard & Poor's – AAA; Moody's – Aaa.

Certificate: 1-A-2: Standard & Poor's – AAA; Moody's – Aaa.

(e) **Current ratings of the certificate(s):**

Certificate: 1-A-1: Standard & Poor's – AAA; Moody's – B3.

Certificate: 1-A-2: Standard & Poor's – A; Moody's – Caa1.

(f) **URL of prospectus supplement for this securitization:**

<http://www.sec.gov/Archives/edgar/data/1269518/000095012905000801/v04622b5e424b5.txt>

(g) **Registration statement pursuant or traceable to which the certificate(s) were issued:** Certificates in this trust, including the certificates that the Bank purchased, were issued pursuant or traceable to a registration statement filed by CWALT with the SEC on form S-3 on

⁶ CWALT 2005-1CB was a prefunded securitization. On the closing date of the securitization there were 5,782 mortgage loans in the trust. After the closing date of the securitization, the trust purchased an additional 698 mortgage loans.

1 September 23, 2004. Annexed to the registration statement was a prospectus. The prospectus was
2 amended from time to time by prospectus supplements whenever a new series of certificates was
3 issued pursuant or traceable to that registration statement.

4 **Item 52. Untrue or misleading statements about the LTVs of the mortgage loans:**

5 In the prospectus supplement, Deutsche and CWALT made the following statements
6 about the LTVs of the mortgage loans in the collateral pool of this securitization.

7 (a) "No Initial Mortgage Loan had a Loan-to-Value Ratio at origination of more than
8 100.00%." CWALT 2005-1CB Pros. Sup. S-19.

9 (b) In the section of the prospectus supplement entitled "The Mortgage Pool,"
10 Deutsche and CWALT presented tables of statistics about the mortgage loans in the collateral
11 pool. CWALT 2005-1CB Pros. Sup. S-21 to S-47. Each table focused on a certain characteristic
12 of the loans (for example, current principal balance) and divided the loans into categories based
13 on that characteristic (for example, loans with current principal balances of \$0.01 to \$50,000,
14 \$50,000.01 to \$100,000, \$100,000.01 to \$150,000, etc.). Each table then presented various data
15 about the loans in each category. Among these data was the "Weighted Average Original Loan-
16 to-Value Ratio." There were 10 such tables in "The Mortgage Pool" section for the loans in loan
17 group 1. In each table, the number of categories into which the loans were divided ranged from
18 three to 64. Thus, in "The Mortgage Pool" section of the prospectus supplement, Deutsche and
19 CWALT made hundreds of statements about the original LTVs of the loans in loan group 1.
20 CWALT 2005-1CB Pros. Sup. S-21 to S-28.

21 (c) "As of the initial cut-off date, the weighted average original Loan-to-Value Ratio
22 of the Initial Mortgage Loans in loan group 1 is approximately 74.29%." CWALT 2005-1CB
23 Pros. Sup. S-25.

24 (d) In "The Mortgage Pool" section, Deutsche and CWALT presented similar tables
25 of statistics about the mortgage loans in loan group 2. In these tables, Deutsche and CWALT
26 similarly made hundreds of statements about the original LTVs of the loans in loan group 2.
27 CWALT 2005-1CB Pros. Sup. S-29 to S-34.

28